

Mr. Charles Graber

May 6, 1988

- 2 -

This letter shall also not be construed as a final action of the Department of Environmental Resources.

If you have any questions concerning this matter, please feel free to contact me at 270-1948.

Very truly yours,

*MP*

MICHAEL PENNELLA  
Waste Management Specialist

cc: Mr. Danyliw  
Mr. Bonner  
Compliance  
Division of Compliance & Monitoring  
EPA ✓  
Re 30 (DAC)126.17

RECEIVED

MAY 3 1988

Permitting Department Branch  
(010110)

SUBJECT: RCRA Inspection - *CRC Chemicals - Warminster, Pa.*  
*PAD 069880029*

DATE:

FROM: *gk* Gregory A. Koltonuk, Environmental Scientist  
RCRA Enforcement Section (3HW11)

File

TO: *PA* Peter W. Schaul, Chief  
RCRA Enforcement Section (3HW11)

BASED UPON A REVIEW OF THE RCRA INSPECTION REPORT FOR THE FACILITY  
REFERENCED ABOVE, I HAVE DETERMINED THAT NO FURTHER ACTION IS  
REQUIRED AT THIS TIME.





EPA

HAZARDOUS WASTE INSPECTION REPORT  
Generators - Part A

Date of inspection 6/15/87 Time start 0930 Time finish 12<sup>00</sup>  
Name of inspector Michael Pennella  
Company, installation name CRC Chemicals  
Location 885 Louis Drive Warminster Pa 18974  
County Bucks Municipality Warminster Twp.  
Identification number PAD069880029  
Name of responsible official Allen Reed  
Title VP  
Mailing address 2m  
Area code and phone no. (215) 674-4300  
Name of person interviewed Same  
Title \_\_\_\_\_  
Mailing address (if different from above) \_\_\_\_\_  
Area code and phone no. \_\_\_\_\_

1. Current waste handling method:

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal
- b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim
- c. ☒ Off-site ☒ treatment, ☒ storage, ☒ disposal
- d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

- a. 3500 kg./mo.
- b. \_\_\_\_\_ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number:

U159 U220  
U226 U210  
U239

4. Are hazardous wastes transported off-site by the generator? ☐ Yes ☒ No



**HAZARDOUS WASTE INSPECTION REPORT**  
Generators - Part B

1- NON-COMPLIANCE, 2-COMPLIANCE, 3-NOT APPLICABLE, 4-NOT DETERMINED

COMPLIANCE STATUS				REQUIREMENT	CHAPTER CITATION
1	2	3	4		
	✓			Identification number	75.262
	✓			Hazardous waste shipments offered only to licensed transporters	(c) (1)
	✓			Authorization received from TSD facility for wastes shipped off-site	(c) (4)
		✓		PA manifest used for intrastate shipments	(d)
	✓			Disposer state manifest or EPA format manifest used for out-of-state shipments	(e) (1) (i)
	✓			Manifests filled out properly and completely	(e) (1) (ii)
	✓			Manifests routed properly	(e) (1)
		✓		Proper U.S. DOT shipping containers or packages <i>Tanks</i>	(e) (2)
		✓		Shipping containers marked and labeled according to U.S. DOT	(f) (1) (i)
	✓			Containers of 110 gal. or less marked with required PA label	(f) (1) (ii)
		✓		Placards offered to transporter	(f) (1) (iii)
	✓			Wastes accumulated on-site for less than 90 days	(f) (2)
	✓			Wastes stored in proper containers and properly marked and labeled	(g) (1)
		✓		Containers managed in accordance with 75.265(q)	(g) (1) (i)
	✓			Containers clearly marked with accumulation date and visible for inspection	(g) (1) (ii)
		✓		Records retained at designated location for 20 years	(g) (1) (iv)
	✓			Quarterly reports submitted to the Department	(h)
		✓		Exception reporting procedures followed	(i)
	✓			Hazardous waste disposal plan, if required	(j)
	✓			Spill reporting procedures followed	(l)
	✓			Preparedness, Prevention and Contingency Plan approved and implemented	(m) (1)
		✓		Special requirements followed for international shipments	(m) (5)
	✓			Determination	(o)
	✓			Tanks	(b)
	✓			Personnel training	(g) (1) (ii)
					(g) (1) (v)





1- NON-COMPLIANCE, 2-COMPLIANCE, 3-NOT APPLICABLE, 4-NOT DETERMINED

COMPLIANCE STATUS				REQUIREMENT	CHAPTER CITATION
1	2	3	4		
	✓			Containers managed to prevent leaks and spills	(q) (1),
		✓		Containers are compatible with waste stored.	(q) (2)
		✓		Containers are closed during storage	(q) (3)
		✓		Container storage area inspected weekly for leaks, deterioration, etc.	(q) (5)
		✓		Containers holding ignitable or reactive wastes are set back 15 m (50 ft) from property line.	(q) (6)
	✓			Satisfactory procedures followed for handling incompatible wastes.	(q) (7),
	✓			Incompatible wastes separated or protected from other materials.	(q) (9)
	✓			Containers and tanks labeled to identify accurately hazardous waste contained.	Act 97
	✓			Precautions taken for tanks holding ignitable, reactive, or incompatible waste or material	Section 403(b) (r) (2)
	✓			Tanks managed to prevent leaks, rupture, corrosion, or otherwise failing.	(r) (3)
	✓			Uncovered tanks operated to ensure at least 60 cm (2 ft) of freeboard.	(r) (4)
	✓			Uncovered tanks equipped with an overflow alarm and an overflow device to a standby tank with a capacity equal to or exceeding the freeboard requirement.	(r) (4)
	✓			Continuously fed tanks equipped with a means to stop the inflow.	(r) (5)
	✓			Containment structure with a capacity that equals or exceeds the largest above ground tank volume plus a reasonable allowance for precipitation based on local weather conditions and plant operations provided for liquid storage in above ground or partially above ground tanks.	(r) (6)
	✓			Waste analyses and/or trial tests conducted on hazardous wastes substantially different from wastes previously treated or stored; or chemically treat hazardous waste with a substantially different process than any previously used in that tank.	(r) (7)
	✓			Discharge control equipment inspected once each operating day.	(r) (8) (i)
	✓			Monitoring equipment data inspected once each operating day.	(r) (8) (ii)
	✓			Liquid level of tanks inspected once each operating day.	(r) (8) (iii)
	✓			Construction materials of tanks inspected weekly.	(r) (8) (iv)
	✓			Construction materials of discharge confinement structures and area immediately surrounding inspected weekly.	(r) (8) (v)
	✓			All hazardous waste removed from tanks and related appurtenances at closure.	(r) (9)
	✓			Placement of ignitable or reactive waste only with the Department's approval	(r) (10)
	✓			Covered tanks in which ignitable or reactive waste is treated or stored meets NFPA buffer zone requirements.	(r) (11)
	✓			Precautions taken for handling ignitable, reactive or incompatible waste or material.	(r) (12),





Date of Inspection 6/15/87 Identification Number PAD069880025

Company, Installation Name CRC Chemicals

County Bucks Municipality Warminster

- 1) Waste are being shipped off site < 90 day keeping the facility in a generator only status and therefore it is a closed TSD.
- 2) Generator is in compliance with 75.262 requirements.
- 3) Containment wall around above ground tanks is starting to develop cracks. This should be sealed to prevent further deterioration.
- 4) One drum of dirty methylene chloride was palletized and should be placed into containment wall ASAP. This drum may also be pumped into other waste.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Solid Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) John B. Reed

Date 6/15/87

Inspector (signature) Muhail Pennella

Date 6/15/87





COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL RESOURCES  
BUREAU OF SOLID WASTE MANAGEMENT

HBG

## INSPECTION REPORT

Site ID # PAD 069880029 License # \_\_\_\_\_  
 Site Name: CRC Chemicals USA Phone # ( ) \_\_\_\_\_  
 Address 885 Louis Dr.  
 City Worminster State PA Zip Code \_\_\_\_\_  
 Municipality Worminster Twp County Becks  
 Responsible Official Allen Reed Title V.P.  
 Person Interviewed Same Title ..  
 Inspector Michael M. Bock

## Inspection Type

## (Generator Only)

- |                 |                 |               |                                    |                                      |
|-----------------|-----------------|---------------|------------------------------------|--------------------------------------|
| 01 Routine      | 11 Part B       | 51 Routine    | Hazardous <input type="checkbox"/> | Treatment <input type="checkbox"/>   |
| 04 Follow Up    | 12 Complaint    | 54 Follow Up  | Residual <input type="checkbox"/>  | Storage <input type="checkbox"/>     |
| 05 Crit Stage   | 13 Withdrawn    | 56 Sample     | Municipal <input type="checkbox"/> | Disposal <input type="checkbox"/>    |
| 06 Sample Only  | 14 Closure      | 60 Survey     |                                    | Generator <input type="checkbox"/>   |
| 07 Permitting   | 15 Post Closure | 62 Complaint  |                                    | Processing <input type="checkbox"/>  |
| 08 Superfund    | 50 Record Rev   | 70 Record Rev |                                    | Surface App <input type="checkbox"/> |
| 09 Ground Water | 99 Other        | 98 Other      |                                    | Transporter <input type="checkbox"/> |
| 10 Survey       |                 |               |                                    |                                      |

Site ID # PAD 069880029 On-Site Start Time 9:30  
 On-Site End Time 11:45  
 On-Site Total Time 2 1/2

Due Date 092486 Inspection Date 092486 Type 14 Inspector ID # 2117 # Violation 00 Enforcement ☐

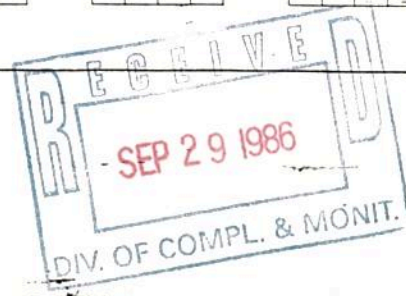
Comment TANK IS CLOSED - INT. STAT. TERM.

Sample # Low ☐ Sample # High ☐

Monitoring Points Sampled

☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐

☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐



HAZARDOUS WASTE INSPECTION REPORT  
TSD Facilities - Part A

CLOSURE  
INSPT.

Date of inspection 9/24/86 Time start 9:30 AM Time finish 11:45 AM  
Name of inspector Michael M. Bielek  
Company, installation name CRC Chemicals USA  
Location 885 Louis Dr. Warminster, PA 18974  
County Bucks Municipality Warminster Twp  
Identification number PAD 069880029  
Name of responsible official Allen Reed  
Title V.P.  
Mailing address Same as above  
Area code and phone no. 215-674-4300  
Name of person interviewed Allen Reed, Charlie Graeber  
Title \_\_\_\_\_  
Mailing address (if different from above) \_\_\_\_\_  
Area code and phone no. \_\_\_\_\_

1. Site characterization:

- a. ☐ Treatment - ☐ surface impoundments, ☐ chemical, ☐ physical, ☐ biological  
b. ☒ Storage - ☐ containers, ☒ tanks, ☐ surface impoundments, ☐ waste piles  
c. ☐ Disposal - ☐ land treatment, ☐ landfill, ☐ incineration, ☐ thermal treatment  
d. ☐ Use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Does the facility generate hazardous wastes? ☒ Yes ☐ No

3. Types of hazardous waste produced by Hazardous Waste Number:

U159 U239 U210  
U226 U220

4. Are hazardous wastes transported off-site by the facility? ☐ Yes ☒ No



## HAZARDOUS WASTE INSPECTION REPORT

## Part C - Comments

Date of Inspection

9/24/86

Identification Number

RAD 069880029

Company, Installation Name

CRC Chemicals USA

County

- Bucks

Municipality

Warminster

Manifest #NTA 0159736 - 8/27/86, 2,530 gal to Rollins, N  
" #NTA 0159735 - 6/20/86, 2900 gal to Rollins, N  
" #NTA 0159734 - 3/21/86, 4000 gal to Rollins, N

A review of the above documents on file at the facility indicates that since my last inspection (2/26/86) the facility has been operating as a "Generator" only in that waste shipments are being made within the 90 day limit as required by 75.262(g)(1)(i). Therefore, this inspection verifies that the facility is no longer a hazardous waste storage facility subject to permitting.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Solid Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature)

Inspector (signature)

Date

9/24/86

Date

9/24/86



FY 1986 HAZARDOUS WASTE COMPLIANCE MONITORING AND ENFORCEMENT LOG

1. EPA ID: P0069880079

2. HANDLER NAME: CRC Chemicals USA

3. ADDRESS: 885 Louis Dr., Warminster, PA 18974

4. DATE OF INITIAL EVALUATION WHICH IS THE BASIS FOR THIS REPORT: 2/24/86

5. AGENCY RESPONSIBLE FOR EVALUATION:  
Put code in box 5  
Choose one

E = EPA  
S = State  
J = Joint  
C = Contractor/EPA  
0 = Other  
B = Contractor/State  
X = Oversight

6. TYPE OF EVALUATION COVERED BY THIS REPORT:  
Put code in box  
Choose one

1 = Evaluation Inspection  
2 = Sampling Inspection  
3 = Record Review  
4 = Ground Water Monitoring Evaluation  
5 = Follow Up  
6 = Other - Citizen Complaint  
7 = Other - Part B Call-In  
8 = Other - Withdrawal Candidate  
9 = Other - Closed Facility  
10 = Other - General

7. DATE OF EVALUATION COVERED BY THIS REPORT (enter only if different from 5): 1/1

8. AREA AND CLASS OF VIOLATION (enter 'X' in appropriate box if violations found. Enter '0' if no violations found in Area violated.)

Class of Violation	Area of Violation			
	GM	CL/PC	Pin. Rel	Pt. B
I	0	0	0	0
II	0	0	0	0

Area of Violation

Pt. B

Capl. Sch

Manifest

Other

9. ENFORCEMENT ACTIONS:

Class	Area of Violation	Type (use code)	Date Action Taken	Compliance Dates		Penalty Assessed	Collected	Resp. Ag. (use code)
				Scheduled	Actual			

Codes for Types of Enforcement Actions: 03 = Warning Letter  
05 = Administrative Order  
10 = Informal  
11 = Filed Civil Action  
12 = Filed Criminal Action  
15 = \$3008(h) Final Order  
(See instructions for additional codes)

Codes for Resp. Agency: E = EPA  
S = State  
X = EPA  
oversight

9a. STATUS OF HANDLER WITH COMPLIANCE SCHEDULE OF ORDERS: Meeting compliance schedule Yes No Dr. 1-1-1  
10. Comments: Tank storage is terminated in 11/85. Waste Storage is terminated 01/10/86



HAZARDOUS WASTE INSPECTION REPORT  
TSD Facilities - Part A

CLOSURE  
INSPT.

Date of inspection 9/24/86 Time start 9:30 AM Time finish 11:45 AM  
Name of inspector Michael M. Bobek  
Company, installation name CRC Chemicals USA  
Location 885 Louis Dr. Warminster, PA 18974  
County Bucks Municipality Warminster Twp  
Identification number PAD 069880029  
Name of responsible official Allen Reed  
Title V.P.  
Mailing address Same as above  
Area code and phone no. 215-674-4300  
Name of person interviewed Allen Reed ; Charlie Graeber  
Title \_\_\_\_\_  
Mailing address (if different from above) \_\_\_\_\_  
Area code and phone no. \_\_\_\_\_

1. Site characterization:

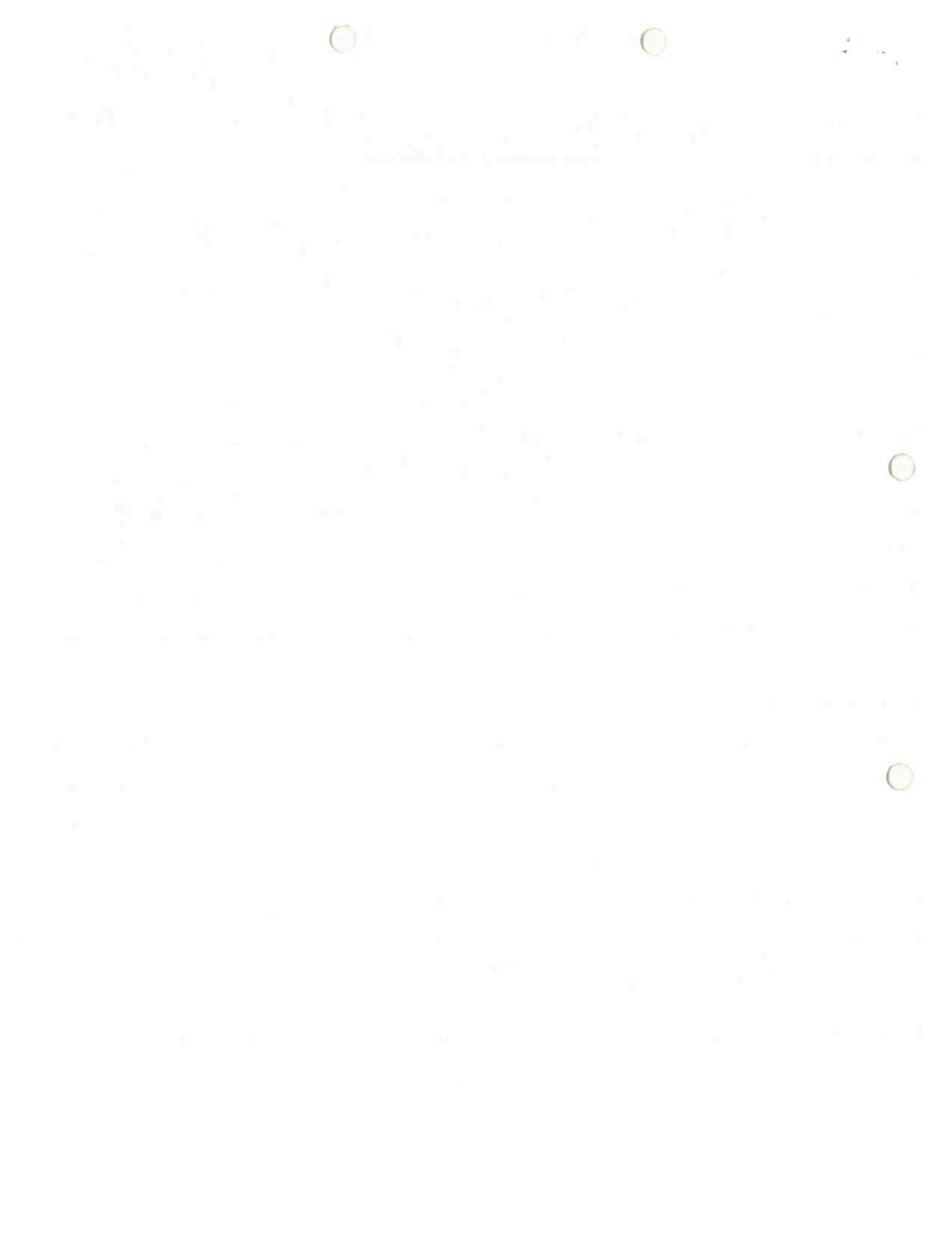
- a. ☐ Treatment - ☐ surface impoundments, ☐ chemical, ☐ physical, ☐ biological  
b. ☒ Storage - ☐ containers, ☒ tanks, ☐ surface impoundments, ☐ waste piles  
c. ☐ Disposal - ☐ land treatment, ☐ landfill, ☐ incineration, ☐ thermal treatment  
d. ☐ Use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Does the facility generate hazardous wastes? ☒ Yes ☐ No

3. Types of hazardous waste produced by Hazardous Waste Number:

U159 U239 U210  
U226 U220

4. Are hazardous wastes transported off-site by the facility? ☐ Yes ☒ No





HAZARDOUS WASTE INSPECTION REPORT  
Part C - Comments

Date of Inspection

9/24/86

Identification Number

PD 069880029

Company, Installation Name

CRC Chemicals USA

County

- Bucks

Municipality

Warminster

Manifest #NTA 0159736 - 8/27/86, 2,530 gal to Rollins, N  
" #NTA 0159735 - 6/20/86, 2900 gal to Rollins, N  
" #NTA 0159734 - 3/21/86, 4000 gal to Rollins, N

A review of the above documents on file at the facility indicates that since my last inspection (2/24/86) the facility has been operating as a "Generator" only in that waste shipments are being made within the 90 day limit as required by 75.262(g)(1). Therefore, this inspection verifies that the facility is no longer a hazardous waste storage facility subject to permitting.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Solid Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature)

Allen S. E. [Signature]

Date

9/24/86

Inspector (signature)

Michael M. Bohan [Signature]

Date

9/21/86





EPA ID: 90069880029

HANDLER NAME: CCC Chemicals USA

ADDRESS: 985 Louis Dr., Warrington, PA 18974

DATE OF INITIAL EVALUATION WHICH IS THE BASIS FOR THIS REPORT: 2/24/86

5. AGENCY RESPONSIBLE FOR EVALUATION:  
Put code in box ☒ E  
Choose one  
E = EPA  
S = State  
J = Joint  
C = Contractor/EPA  
O = Other  
B = Contractor/State  
X = Oversight

6. TYPE OF EVALUATION COVERED BY THIS REPORT:  
Put code in box  
Choose one

- 1 = Evaluation Inspection
- 2 = Sampling Inspection
- 3 = Record Review
- 4 = Ground Water Monitoring Evaluation
- 5 = Follow Up
- 6 = Other - Citizen Complaint
- 7 = Other - Part B Call-In
- 8 = Other - Withdrawal Candidate
- 9 = Other - Closed Facility
- 10 = Other - General

7. DATE OF EVALUATION COVERED BY THIS REPORT (enter only if different from 5): 1/1

8. AREA AND CLASS OF VIOLATION (enter 'X' in appropriate box if violations found. Enter '0' if no violations found in Area violated.)

Class of Violation	Area of Violation					Pt. B	Cmpl. Sch	Manifest	Other
	GM	CL/PC	Pin. Res	Pin. Res	Pin. Res				
I	0	6	0	0	0	0	0	0	0
II	0	0	0	0	0	0	0	0	0

9. ENFORCEMENT ACTIONS:

Class	Area of Violation	Type (use code)	Date Taken	Compliance Dates		Assessed	Penalty Collected	Resp. Ag. (use code)
				Scheduled	Actual			

Codes for Types of Enforcement Actions: 03 = Warning Letter  
05 = Administrative Order  
10 = Informal  
(See instructions for additional codes)

Codes for Resp. Agency: E = EPA  
S = State  
X = EPA oversight

9a. STATUS OF HANDLER WITH COMPLIANCE SCHEDULE OF ORDERS: Meeting compliance schedule Yes No Dr. 1-1-1  
Comments: Tank storage is terminated. Interior status for Haz. Waste Storage is terminated.  
Part B returned to the facility 9/4/86





HAZARDOUS WASTE INSPECTION REPORT  
TSD Facilities - Part A

CLOSURE  
INSPT.

Date of inspection 9/24/86 Time start 9:30 AM Time finish 11:45 AM  
Name of inspector Michael M. Bobek  
Company, installation name CRC Chemicals USA  
Location 885 Louis Dr. , Warminster, PA 18974  
County Bucks Municipality Warminster Twp  
Identification number PAD 069880029  
Name of responsible official N/len Reed  
Title V.P.  
Mailing address Same as above  
Area code and phone no. 215-674-4300  
Name of person interviewed N/len Reed , Charlie Graeber  
Title \_\_\_\_\_  
Mailing address (if different from above) \_\_\_\_\_  
Area code and phone no. \_\_\_\_\_

1. Site characterization:

- a. ☐ Treatment - ☐ surface impoundments, ☐ chemical, ☐ physical, ☐ biological  
b. ☒ Storage - ☐ containers, ☒ tanks, ☐ surface impoundments, ☐ waste piles  
c. ☐ Disposal - ☐ land treatment, ☐ landfill, ☐ incineration, ☐ thermal treatment  
d. ☐ Use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Does the facility generate hazardous wastes? ☒ Yes ☐ No

3. Types of hazardous waste produced by Hazardous Waste Number:

U159 U239 U210  
U226 U220

4. Are hazardous wastes transported off-site by the facility? ☐ Yes ☒ No





HAZARDOUS WASTE INSPECTION REPORT  
Part C - Comments

Date of Inspection 9/24/86 Identification Number PD 069880029  
Company, Installation Name CRC Chemicals USA  
County - Bucks Municipality Warminster

Manifest #NTA 0159736 - 8/27/86, 2,530 gal to Rollins, N  
" #NTA 0159735 - 6/20/86, 2900 gal to Rollins, N  
" #NTA 0159734 - 3/21/86, 4000 gal to Rollins, N

A review of the above documents on file at the facility indicates that since my last inspection (2/24/86) the facility has been operating as a "Generator" only in that waste shipments are being made within the 90 day limit as required by 75.2629(X). Therefore, this inspection verifies that the facility is no longer a hazardous waste storage facility subject to permitting.

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Person Interviewed (signature) Allen S. [illegible] Date 9/24/86  
Inspector (signature) Michael M. [illegible] Date 9/24/86





1. EPA ID: PA069880071

2. HANDLER NAME: CEC Chemicals USA

3. ADDRESS: 885 Louis Dr. Westminster, CA 92674

4. DATE OF INITIAL EVALUATION WHICH IS THE BASIS FOR THIS REPORT: 2/24/86

5. AGENCY RESPONSIBLE FOR EVALUATION:  
Put code in box 5  
Choose one  
E = EPA  
S = State  
J = Joint  
C = Contractor/EPA  
0 = Other  
B = Contractor/State  
X = Oversight

6. TYPE OF EVALUATION COVERED BY THIS REPORT:  
Put code in box  
Choose one  
1 = Evaluation Inspection  
2 = Sampling Inspection  
3 = Record Review  
4 = Ground Water Monitoring Evaluation  
5 = Follow Up  
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Class of Violation	Area of Violation					
	GM	CL/RC	Pin. Res	Pt. B	Comp. Sch	Manifest
I	0	6	0	0	0	0
II	0	0	0	0	0	0

9. ENFORCEMENT ACTIONS:

Class	Area of Violation (use code)	Date Action Taken	Compliance Dates Scheduled	Actual	Assessed	Penalty Collected	Resp. Ag. (use code)

Codes for Types of Enforcement Actions: 03 = Warning Letter  
05 = Administrative Order  
10 = Informal  
11 = Fined Civil Action  
12 = Fined Criminal Action  
15 = \$3008(h) Fined Order  
Codes for Resp. Agency: E = EPA  
S = State  
X = EPA Oversight  
(See Instructions for additional codes)

9a. STATUS OF HANDLER WITH COMPLIANCE SCHEDULE OF ORDERS: Meeting compliance schedule Yes No  
10. Comments: Task storage is terminated. Interior status for Haz. Waste Storage is terminated. Task is returned to the facility 9/4/86.





1. EPA ID PAD06980029

2. FACILITY NAME CRC Chemicals

By LARRY LUNSI

Date: 9 / 29 / 86  
Month Day Year

☐ PERMIT MOD ☐ RD&D ☐ ATC ☐ PCP

I. For each appropriate process, fill in the Process Amount and Unit:

	IND	PROCESS AMOUNT	UNIT (Circle one)
<b>3. STORAGE</b>			
3A. Containers	_____	_____ - _____	G L
3B. Tanks	_____	_____ - _____	G L
3C. Waste Piles	_____	_____ - _____	Y C
3D. Surface Impoundments	_____	_____ - _____	G L
<b>4. DISPOSAL</b>			
4A. Injection Well	_____	_____ - _____	G L U V
4B. Landfills	_____	_____ - _____	A F
4C. Land Application	_____	_____ - _____	B Q
4D. Ocean	_____	_____ - _____	U V
4E. Surface Impoundments	_____	_____ - _____	G L
<b>5. TREATMENT</b>			
5A. Tanks	_____	_____ - _____	U V
5B. Surface Impoundments	_____	_____ - _____	U V
5C. Incinerators	_____	_____ - _____	E H K
5D. Other	_____	_____ - _____	U V S R

II. Enter DATES for the following actions:

6. <b>FACILITY MANAGEMENT PLAN</b> Date Screened: ____/____/____ Sign. (ES, NS) _____ Date Approved: ____/____/____	<b>PART B APPLICATION:</b> 7. Date Called in: ____/____/____ 8. Date Received: ____/____/____	<b>EXPOSURE INFORMATION:</b> 9. Received: ____/____/____ 10. Referred: ____/____/____
11. <b>DATE APPLICATION DETERMINED TO BE COMPLETE:</b> ____/____/____	12. <b>REQUEST FOR WITHDRAWAL of APPLICATION</b> Received: ____/____/____ Reason: _____ (LN, NW, FC, SQ, FE, OT)	13. <b>WITHDRAWAL REQUEST DETERMINATION:</b> Date: ____/____/____ Status: _____ (AR, DR, FE)
14. <b>CLOSURE PLAN SUBMITTED:</b> ____/____/____	15. <b>DATE OF PUBLIC NOTICE</b> <u>9/24/86</u> <u>CLOSURE INSPECTION</u> Type of Action: _____	16. <b>CLOSURE PLAN APPROVED:</b> ____/____/____ 17. <b>CLOSURE CERTIFIED:</b> ____/____/____
<b>POST CLOSURE PLAN:</b> 18. Date Submitted: ____/____/____ 19. Date Approved: ____/____/____	20. <b>PERMIT DETERMINATION:</b> Date: ____/____/____ Status (PI, PD, PP, PJ, PG) _____	21. <b>PERMIT MODIFICATION:</b> Date Issued: ____/____/____ Type (GW, CA, BO, OT) _____
22. <b>PERMIT EXPIRATION DATE:</b> ____/____/____ 23. <b>PERMIT TERMINATION DATE:</b> ____/____/____	24. <b>DOUBLE LINER WAIVER REQUEST:</b> Date Received: ____/____/____ Date Appr/Denied: ____/____/____ Waiver Status (AR, DR): _____	25. <b>PREVIOUSLY UNREGULATED "SAMPLE":</b> Present at Facility? _____ (YE, NO, UN)
26. <b>DETERMINATION OF COMPLIANCE WITH 265.91 AND 270.14(c)(4)</b> Date: ____/____/____	27. <b>MONITORING PROGRAM DEVELOPED:</b> Date Developed: ____/____/____ Type (DM, DO, PC, OC, XA, OA): _____  DM = Detection Monitoring thru draft Permit or Permit Mod DO = Detection Monitoring thru an Enforcement Order PC = Compliance Monitoring thru draft Permit or Permit Mod. OC = Compliance Monitoring thru an Enforcement Order XA = Corrective Action thru draft Permit or Permit Mod. OA = Corrective Action thru an Enforcement Order	
28. <b>PA/SI COMPLETED:</b> Date: ____/____/____ RI Needed? (RN, RX) _____	29. <b>FACILITY REMEDIAL INVESTIGATION:</b> Plan Approved: ____/____/____ Status (RP, PO) _____ 30. Inves. Completed: ____/____/____ Status (CN, CX) _____	31. <b>CORRECTIVE MEASURES PROGRAM:</b> Date Plan Approved: ____/____/____



SUBJECT: CRC CHRNICALS

TO: JOE HOYER - HARRISBURG

FROM: LARRY LUNSK - NORRISTOWN

ENCLOSED IS THE FINAL INSPECTION FOR THE  
CRC CHRNICALS CLOSURE OF THEIR HAZARDOUS  
WASTE TANK



HAZARDOUS WASTE INSPECTION REPORT  
TSD Facilities - Part A

Date of inspection Feb. 26, 1986 Time start 10:30 Time finish 12:00  
Name of inspector Michael M. Bobek  
Company, installation name CRC Chemicals  
Location 885 Louis Drive, Warminster, PA 18974  
County Bucks Municipality Warminster Twp  
Identification number PDD 069880029  
Name of responsible official Allen Reed  
Title VP  
Mailing address Same  
Area code and phone no. 215 - 674-4300  
Name of person interviewed Same  
Title Same  
Mailing address (if different from above) Same  
Area code and phone no. Same

1. Site characterization:

- a. ☐ Treatment - ☐ surface impoundments, ☐ chemical, ☐ physical, ☐ biological  
b. ☒ Storage - ☐ containers, ☒ tanks, ☐ surface impoundments, ☐ waste piles  
c. ☐ Disposal - ☐ land treatment, ☐ landfill, ☐ incineration, ☐ thermal treatment  
d. ☐ Use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Does the facility generate hazardous wastes? ☒ Yes ☐ No

3. Types of hazardous waste produced by Hazardous Waste Number:

U159 U239 U210  
U226 U220

4. Are hazardous wastes transported off-site by the facility? ☐ Yes ☒ No

MAR 10 1986

DIV. OF HAZARDOUS WASTE



105

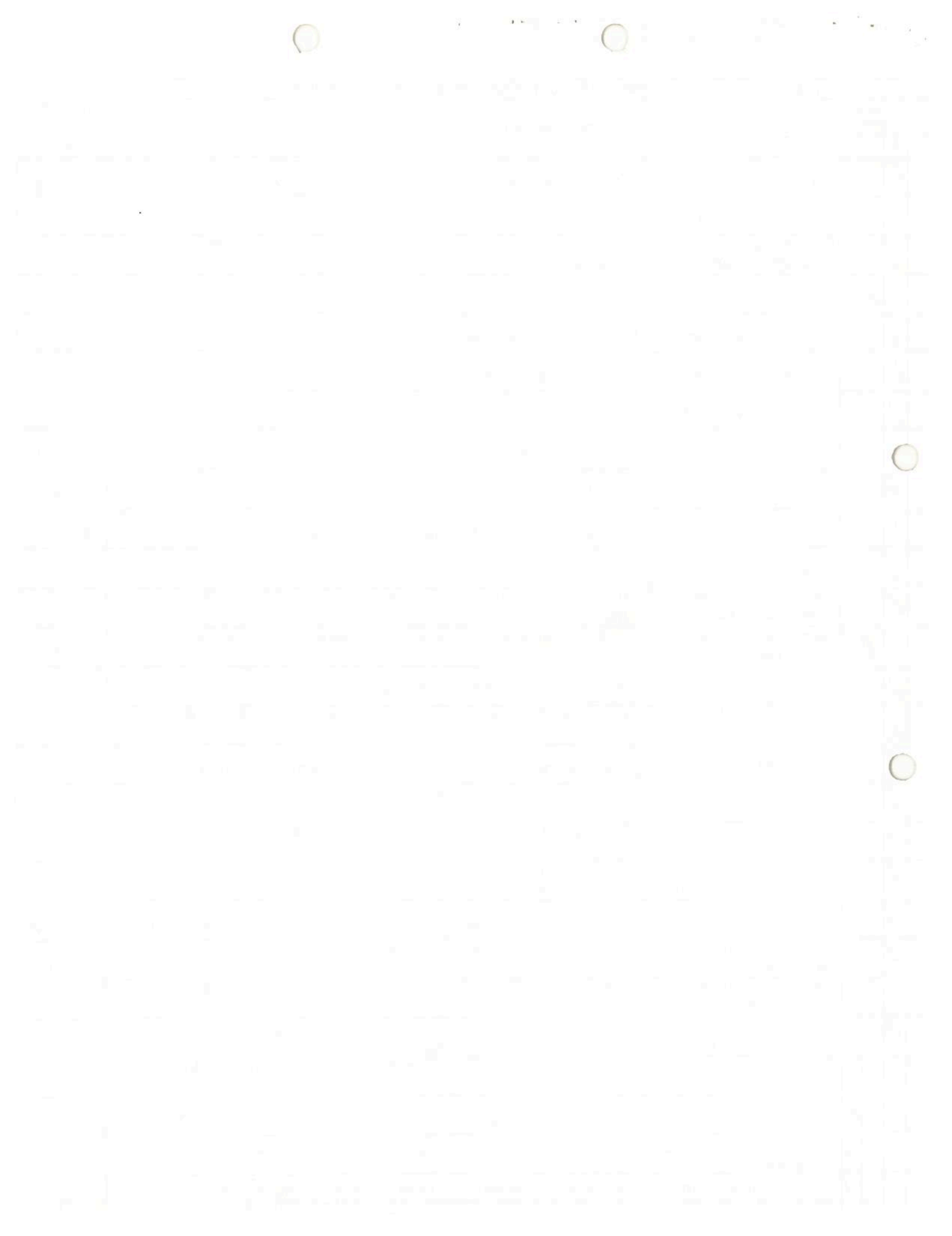




HAZARDOUS WASTE INSPECTION REPORT  
TSD FACILITIES - PART B General p.1

1- NON-COMPLIANCE, 2- COMPLIANCE, 3- NOT APPLICABLE, 4- NOT DETERMINED

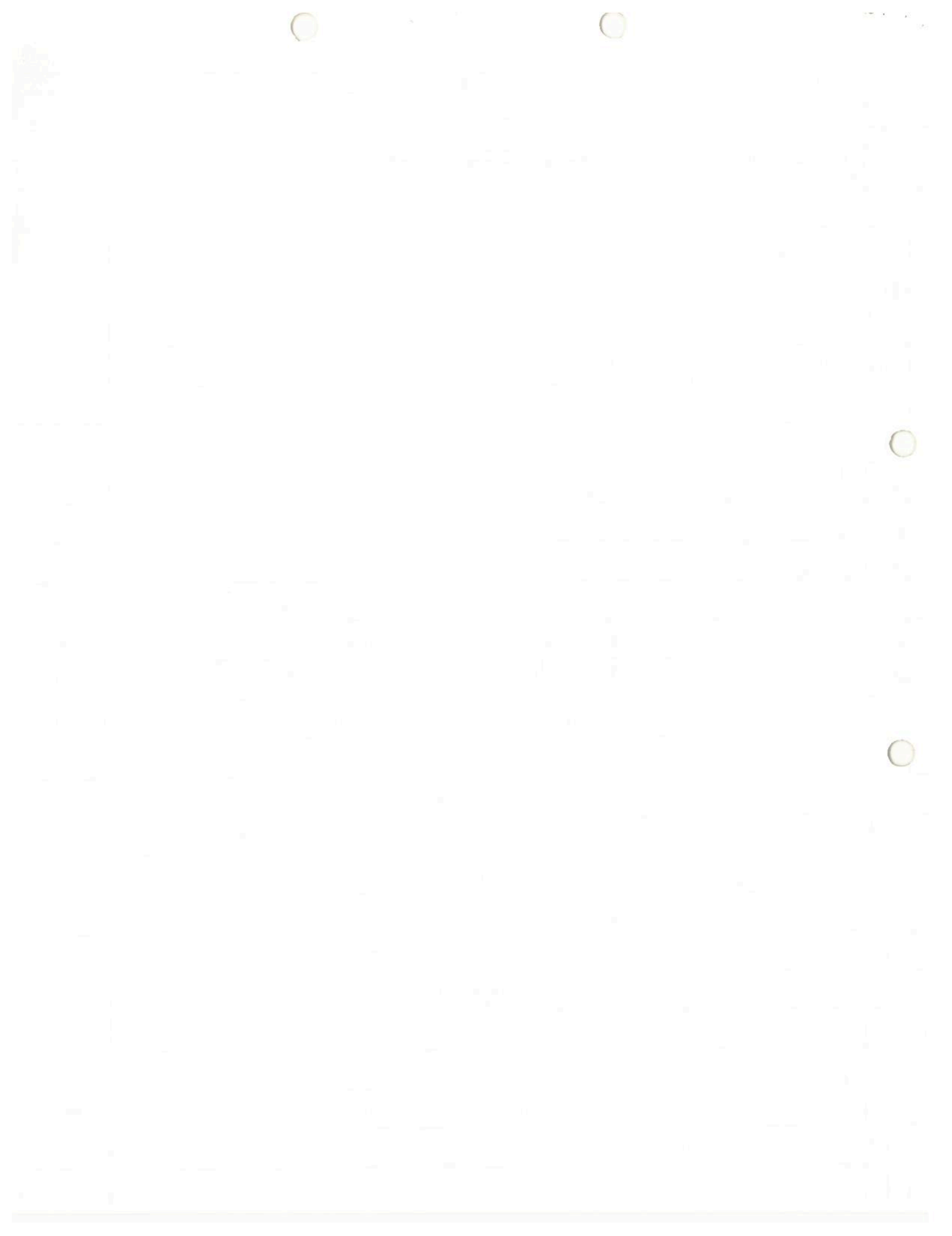
COMPLIANCE STATUS				REQUIREMENT	CHAPTER CITATION
1	2	3	4		
	✓			Part A permit application submitted.	(a) (2), (z)
	✓			Identification number.	(b)
	✓			Wastes accepted at facility transported by haulers licensed to transport hazardous waste by the Department.	(b) (1)
		✓		Waste streams not covered by permit approved by the Department before acceptance	(c) (1)
	✓			Chemical and physical analyses repeated as required.	(c) (1)
	✓			All waste shipments inspected and sampled.	(c) (2)
	✓			Waste analysis plan on-site.	(c) (3)
	✓			24 hr. surveillance at active portion.	(d) (2) (i)
	✓			Artificial barrier at active portion.	(d) (2) (i)
	✓			Proper signs posted and legible at a distance of at least 25 ft.	(d) (3)
	✓			Inspection schedule on-site.	(e) (2)
	✓			Maintenance schedule on-site for equipment or structures which reveal deterioration or malfunction.	(e) (4)
		✓		Immediate remedial action taken where a hazard is imminent or has already occurred.	(e) (4)
	✓			On the job or classroom personnel training program.	(f)
	✓			Records retained for each employee at facility of training, job title, and job description.	(f) (6), (
	✓			Ignitable or reactive wastes separated from source of ignition or reaction.	(g) (1)
	✓			No smoking signs displayed where there are hazards from ignitable or reactive wastes.	(g) (1)
	✓			Treatment, storage, disposal of ignitable or reactive wastes or mixing of incompatible wastes or materials conducted according to requirements.	(g) (2)
	✓			Facility equipped with internal alarm system capable of providing immediate emergency instruction to personnel.	(h) (2) (i)
	✓			Facility equipped with a device for summoning outside emergency assistance.	(h) (2) (i)
	✓			Facility equipped with fire control, spill control, and decontamination equipment.	(h) (2) (i)
	✓			Facility equipped with water at adequate volume and pressure to supply fire control equipment.	(h) (2) (i)
	✓			Facility communications or alarm systems, fire control, spill control, and decontamination equipment tested and maintained.	(h) (3)
	✓			Adequate aisle space maintained to allow unobstructed movement of personnel and equipment during emergencies.	(h) (6)
		✓		Contingency plan on-site and implemented.	(i) (1)
		✓		Contingency plan describes action taken by personnel in the event of an emergency.	(i) (3)
		✓		Contingency plan describes arrangements agreed to for outside emergency services such as police and fire department, hospitals, contractors, etc.	(i) (5)





1- NON-COMPLIANCE, 2-COMPLIANCE, 3-NOT APPLICABLE, 4-NOT DETERMINED

COMPLIANCE STATUS				REQUIREMENT	CHAPTER CITATION
1	2	3	4		
			✓	Contingency plan contains an up-to-date list of names, addresses and phone numbers of all persons qualified to act as emergency coordinator.	75.265 (i) (6)
	✓			Contingency plan contains list of emergency equipment including location, physical description and capabilities of each item	(i) (7)
			✓	Contingency plan contains an evacuation plan if there is a possibility that evacuation could be necessary	(i) (8)
✓				One employee designated as the primary emergency coordinator either on the premises or on call.	(i) (11)
		✓		Facility accepting only PA manifests	(j)
		✓		Manifests properly completed and routed within time limits (24 hrs.)	(j) (2) (3)
		✓		Manifest discrepancies resolved or reported within time limits	(j) (10) (1)
				Written operating record maintained on the premises	(k)
	✓			Written operating record contains description and quantity of wastes and method of treatment, storage or disposal	(k) (2) (i)
	✓			Written operating record contains location and quantity of each hazardous waste	(k) (2) (i)
	✓			Written operating record contains results of waste analyses and treatability tests	(k) (2) (i)
		✓		Written operating record contains reports and details of all incidents	(k) (2) (i)
	✓			Written operating record contains records and results of all inspections	(k) (2) (v)
	✓			Written operating record contains required monitoring, testing, and analytical data	(k) (2) (v)
✓				Written operating record contains closure and post-closure cost estimates	(k) (2) (v)
				All records retained on premises and available for inspection	(l)
		✓		Quarterly reports submitted to the Department	(m)
		✓		Emissions, discharges, fires, explosions, and groundwater contamination reported as required	(m) (2)
		✓		Groundwater monitoring wells located at approved sites	(n) (2)
		✓		Adequate protection of groundwater monitoring wells	(n) (7)
		✓		Groundwater sampling and analysis plan on the premises	(n) (8)
		✓		Groundwater quality assessment and abatement outline on the premises	(n) (14)
✓				Closure plan on the premises and up-to-date	(o) (2) - (9)
		✓		Post-closure plan on the premises and up-to-date	(o) (10) - (1)
✓				Annual closure cost estimate on the premises and up-to-date	(p) (2) - (4)
		✓		Annual post-closure cost estimate on the premises and up-to-date	(p) (5) - (7)

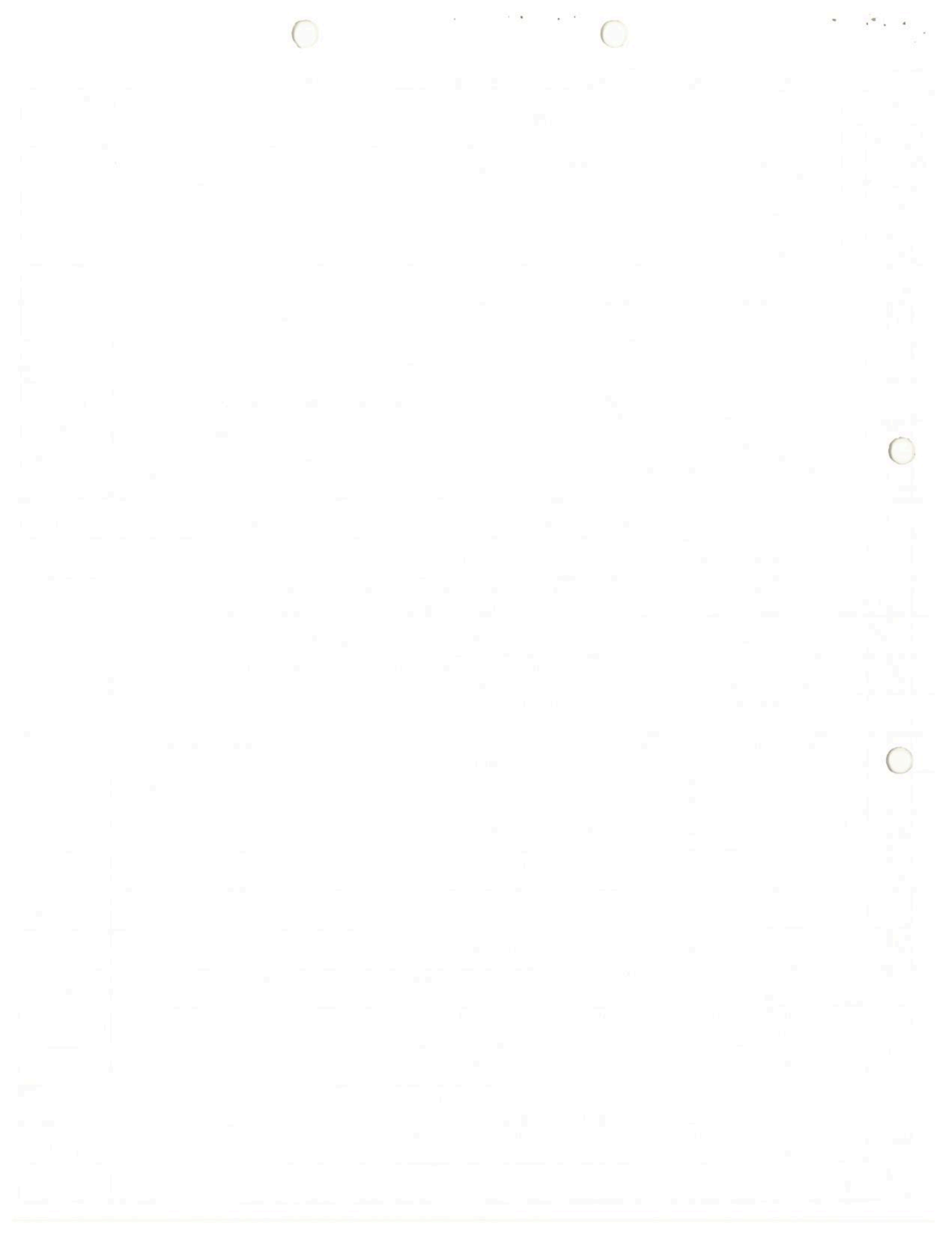




1- NON-COMPLIANCE, 2- COMPLIANCE, 3- NOT APPLICABLE, 4- NOT DETERMINED

COMPLIANCE STATUS				REQUIREMENT	CHAPTER CITATION
1	2	3	4		
✓				Containers managed to prevent leaks and spills	(q) (1), (
	✓			Containers are compatible with waste stored.	(q) (2)
	✓			Containers are closed during storage	(q) (3)
	✓			Container storage area inspected weekly for leaks, deterioration, etc.	(q) (5)
	✓			Containers holding ignitable or reactive wastes are set back 15 m (50 ft) from property line.	(q) (6)
		✓		Satisfactory procedures followed for handling incompatible wastes.	(q) (7), (
	✓			Incompatible wastes separated or protected from other materials.	(q) (9)
	✓			Containers and tanks labeled to identify accurately hazardous waste contained.	Act 97 Section 403(b)
	✓			Precautions taken for tanks holding ignitable, reactive, or incompatible waste or material	(r) (2)
	✓			Tanks managed to prevent leaks, rupture, corrosion, or otherwise failing.	(r) (3)
		✓		Uncovered tanks operated to ensure at least 60 cm (2 ft) of freeboard.	(r) (4)
		✓		Uncovered tanks equipped with an overflow alarm and an overflow device to a standby tank with a capacity equal to or exceeding the freeboard requirement.	(r) (4)
		✓		Continuously fed tanks equipped with a means to stop the inflow.	(r) (5)
	✓			Containment structure with a capacity that equals or exceeds the largest above ground tank volume plus a reasonable allowance for precipitation based on local weather conditions and plant operations provided for liquid storage in above ground or partially above ground tanks.	(r) (6)
	✓			Waste analyses and/or trial tests conducted on hazardous wastes substantially different from wastes previously treated or stored; or chemically treat hazardous waste with a substantially different process than any previously used in that tank.	(r) (7)
	✓			Discharge control equipment inspected once each operating day.	(r) (8) (i)
	✓			Monitoring equipment data inspected once each operating day.	(r) (8) (i)
	✓			Liquid level of tanks inspected once each operating day.	(r) (8) (i)
	✓			Construction materials of tanks inspected weekly.	(r) (8) (i)
	✓			Construction materials of discharge confinement structures and area immediately surrounding inspected weekly.	(r) (8) (v)
		✓		All hazardous waste removed from tanks and related appurtenances at closure.	(r) (9)
	✓			Placement of ignitable or reactive waste only with the Department's approval	(r) (10)
	✓			Covered tanks in which ignitable or reactive waste is treated or stored meets NEPA buffer zone requirements.	(r) (11)
	✓			Precautions taken for handling ignitable, reactive or incompatible waste or material.	(r) (12), (





Date of Inspection 2/26/86 Identification Number RAD 0698800  
 Company, Installation Name CRC Chemicals  
 County Bucks Municipality Warminster Twp

The facility made a decision around September 1985 to discontinue "STORAGE" operation or function solely as a "GENERATOR".

75.265(g) Drums outside containment wall should be kept inside the containment wall.

75.265(K)(2) } Closure cost estimates are not current.  
 " (O)(2-9) }  
 " P(2-4) }

Containment wall appears to have some joint cracking & should be inspected & repaired to insure containment device is effective

Mr Reed will be requesting closure instructions from Facilities with 14 days of this inspection

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Solid Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violation

Person Interviewed (signature) Allen J. Reed Date 2/26/86  
 Inspector (signature) Michael M. Bobek Date 2/26/86





HB6

HAZARDOUS WASTE INSPECTION REPORT  
Generators - Part ADate of inspection Feb. 26, 1986 Time start 10:30 Time finish 12:00Name of inspector Michael M. BobekCompany, installation name CRC ChemicalsLocation 885 Louis Drive, Warminster, PA. 18974County Bucks Municipality Warminster TwpIdentification number PAD 069880029Name of responsible official Allen ReedTitle VPMailing address SameArea code and phone no. 215-674-4300Name of person interviewed SameTitle SameMailing address (if different from above) SameArea code and phone no. Same

## 1. Current waste handling method:

a. ☒ On-site ☐ treatment, ☒ storage, ☐ disposalb. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaimc. ☒ Off-site ☒ treatment, ☐ storage, ☒ disposald. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

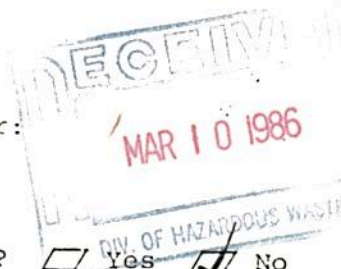
## 2. Amount of hazardous waste produced:

a. ≈ 3100 kg./mo.b. — kg./yr.12/26/85 shipment  
5000 gals since 7/22/85 = 1000 gal  
mo

## 3. Types of hazardous waste produced by Hazardous Waste Number:

U159 U210U226U239U220

## 4. Are hazardous wastes transported off-site by the generator?

Rollins - Bridgeport N.J.☐ Yes ☒ NoNJA 0159733 12/26/85 5000 gal

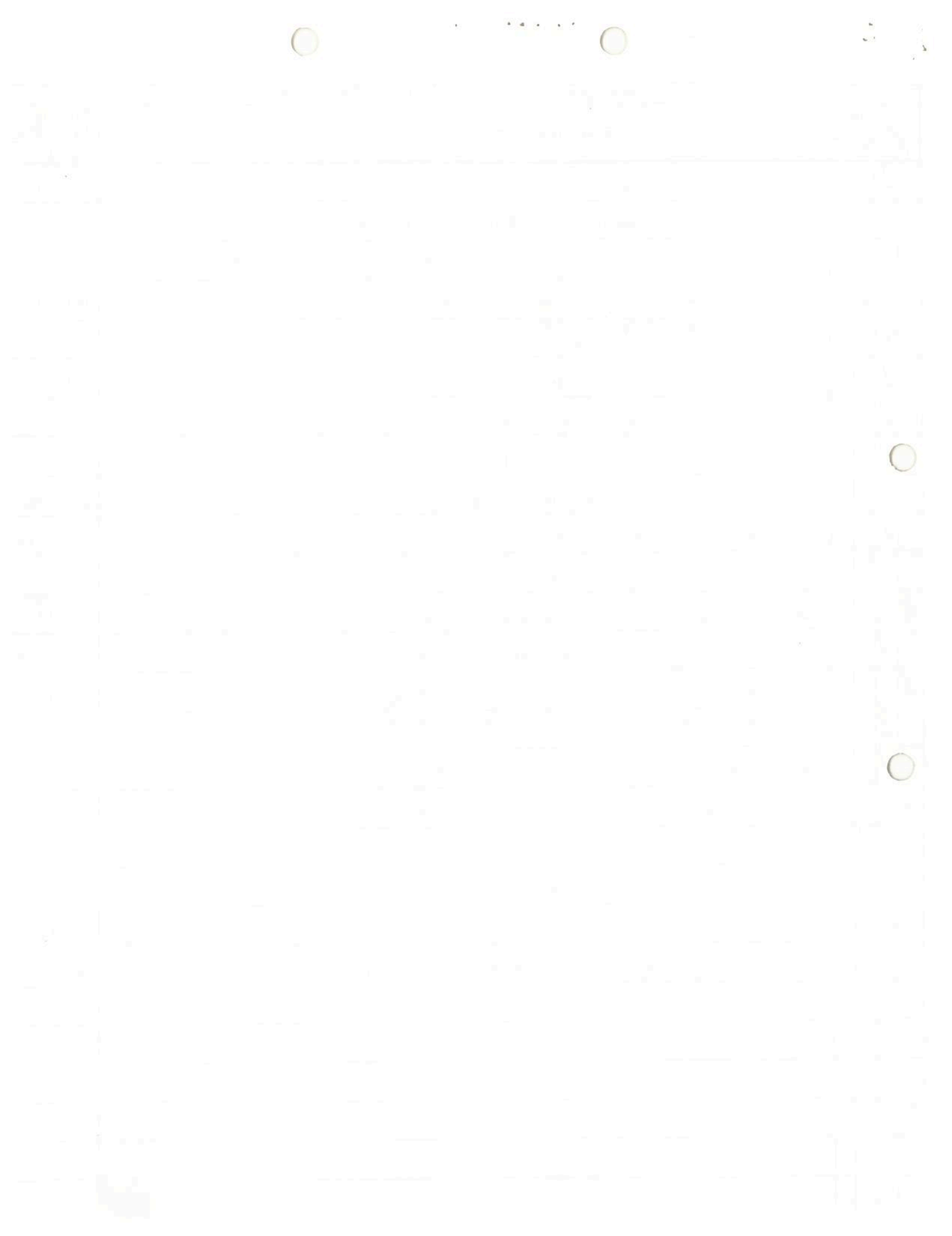
MS 10 1399

HAZARDOUS WASTE INSPECTION REPORT  
Generators - Part 2

1- NON-COMPLIANCE, 2- COMPLIANCE, 3- NOT APPLICABLE, 4- NOT DETERMINED

COMPLIANCE STATUS				REQUIREMENT	CHAPTER CITATION
1	2	3	4		
✓				Identification number	(c) (1)
✓				Hazardous waste shipments offered only to licensed transporters	(c) (4)
✓				Authorization received from TSD facility for wastes shipped off-site	(d)
	✓			PA manifest used for intrastate shipments	(e) (1)
✓				Disposer state manifest or EPA format manifest used for out-of-state shipments	(e) (1) (
✓				Manifests filled out properly and completely	(e) (1)
✓				Manifests routed properly and within time limits (24 hours)	(e) (2)
✓				Proper U.S. DOT shipping containers or packages	(f) (1)
	✓			Shipping containers marked and labeled according to U.S. DOT	(f) (1) (
✓				Containers of 110 gal. or less marked with required PA label	(f) (1) (
		✓		Placards offered to transporter	(f) (2)
✓				Wastes accumulated on-site for less than 90 days	(g) (1)
✓				Wastes stored in proper containers and properly marked and labeled	(g) (1)
✓				Containers managed in accordance with 75.265 (g)	(g) (1)
✓				Containers clearly marked with accumulation date and visible for inspection	(g) (1)
✓				Records retained at designated location for 20 years	(h)
✓				Quarterly reports submitted to the Department	(i)
	✓			Exception reporting procedures followed	(j)
	✓			Hazardous waste disposal plan, if required	(l)
✓				Spill reporting procedures followed	(m) (1)
✓				Preparedness, Prevention and Contingency Plan approved and implemented	(m) (5)
	✓			Special requirements followed for international shipments	(o)





HAZARDOUS WASTE INSPECTION REPORT  
Part C - Comments

Date of inspection 2/26/86 Identification number PAD  
Company, Installation name CRC Chemicals  
County Bucks Municipality Warminster Twp

Wastes are generated at 3 locations:

- laboratory (salt corrosion testing room)
- Can grinding (outside product packaging room)
- tank mixing room (wash & rinse of tanks)

Quarterly reports for 4<sup>th</sup> Quarterly of 1985  
not filed since the September decision to  
eliminate "Storage" status and remain  
as only a "Generator"

55 gal. drums held outside the containment wall  
should be kept inside containment wall to  
comply with 75.265(g)

Stained gravel area at tanker unloading area  
should be ✓'d for contaminants

IPC plan should be reviewed & updated to  
include containment device at blending room, etc.

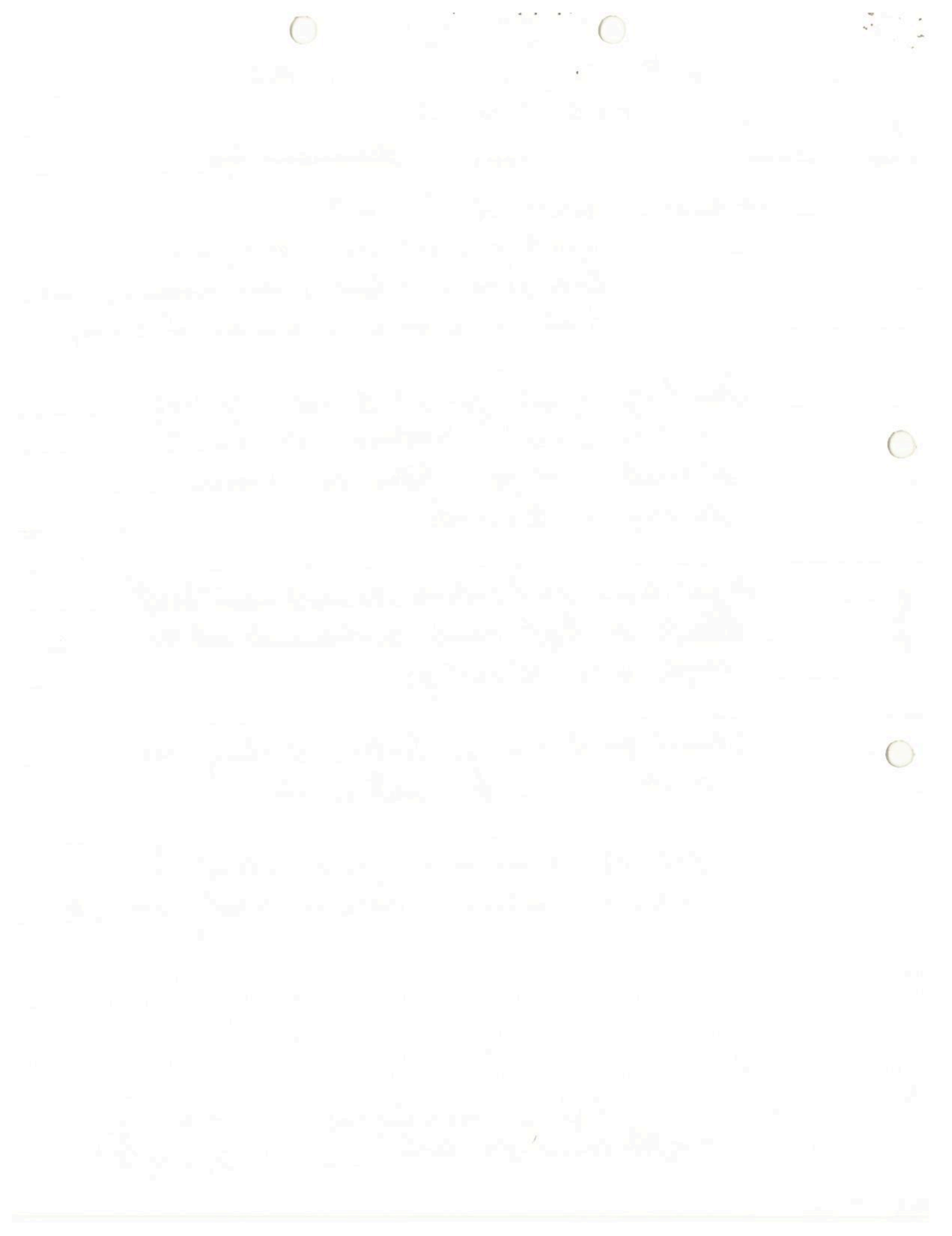
This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Solid Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) Allen O. Regel

Date 2/26/86

Inspector (signature) Michael M. Bobek

Date 2/26/86





Tab:

Notices of Violation





September 8, 2008

Martin Matlin (3LC70)  
U.S. Environmental Protection Agency - Region III  
Office of Land Enforcement  
1650 Arch Street  
Philadelphia, PA 19103-2029

RE: Docket No. R3-08-NOV-RCRA-26  
EPA ID No. PAD069880029

Dear Mr. Matlin:

CRC Industries, Inc. (CRC) is in receipt of the Notice of Violation from the Compliance Evaluation Inspection of April 2<sup>nd</sup>, 2008. In the letter you requested that we submit documentation of any measures taken or initiated to achieve compliance in writing within 30 days. CRC has been working diligently to correct all areas of noncompliance and to ensure that they will remain in satisfactory condition. As requested, CRC wishes to address the status of the violations and the areas of concern noted in the report.

**Violations**

1. *A waste drum in the primary hazardous waste storage area was observed that was not dated.* Immediately following the inspection this drum was properly dated. On May 29<sup>th</sup> all production and lab employees participated in a hazardous waste refresher training class. Sign-in sheets from this training are attached. During the training the rules regarding dating of containers were reviewed, including the need for all drums in the primary hazardous waste storage area to be dated. In addition, the weekly waste storage area inspections are now conducted by my Regulatory Assistant. Any undated containers found during the inspection are immediately dated and reported to management.
2. *A satellite storage drum in the mixing room was observed with an open funnel and bung.* Immediately following the inspection the funnel was removed and the drum was closed. During the May 29<sup>th</sup> refresher training all mixing employees were instructed that drums are to remain closed except when waste is being added and that no funnels are to remain in the drums. As mentioned previously, the weekly waste storage area inspections are now conducted by my Regulatory Assistant. Any open containers found during the inspection are immediately closed and reported to management.
3. *Six containers of used fluorescent lamps were observed that were not labeled.* As noted in your report, these containers were labeled by the end of the inspection. During the May 29<sup>th</sup>

CERTIFIED  
ISO 9001







refresher training, the maintenance employees were reminded that all containers of waste lamps need to be labeled with the "Universal Waste" label. New line items have been added to the weekly inspection form to ensure that the universal waste containers are inspected each week. The updated inspection form was put into use starting in August. A copy of the updated form is attached.

4. *One manifest was found without a Land Disposal Restriction form and it contained waste codes not previously covered by other LDRs.* Following the receipt of your letter we contacted the treatment facility that received the waste and requested a copy of the LDR form. The copy of the LDR is attached. A copy was also placed with the manifest in our files.

#### Areas of Concern

- *You had concerns that since the hazardous waste drums in the primary waste storage area are on racks, not all drums can be easily accessed for inspection.* Drums are first added to the storage area on the bottom level. We have a production employee specifically assigned to inspect drums for proper labeling, dating, closure, etc., prior to moving them to the upper racks. When this inspection has been performed, the employee paints a marking on the front of the drum. This allows easy recognition from the floor that the drums meet all requirements. In addition, we can quickly pull any drums out of the rack for further inspection should there be suspicion of a problem.
- *You had concerns about whether employees might be placing hazardous spill clean-up materials in the blue non-hazardous waste containers in the mixing rooms and throughout the facility. You recommended labeling the containers.* During the May 29<sup>th</sup> refresher training, the proper classification and disposal options for spill clean-up materials were discussed. Employees were reminded that the blue containers are to be used strictly for non-hazardous waste. We have also placed labels on these blue containers that read "Non-Hazardous Waste Only".
- *You had concerns about the use of 'Generator Knowledge' to classify our wastes and suggested that we periodically run analytical testing on the waste streams.* While we have not run recent full analyticals on our hazardous solvent or non-hazardous waste water streams, these streams are tested by the disposal facilities that receive our wastes. If there were any inconsistencies or changes in the waste, we would be notified. In accordance with your recommendation, I requested that the hazardous waste disposal facility take samples from one of our recent pick-ups and perform a full analysis. I should be receiving those results very soon. I plan to make the same request of our waste water receiving facility when we have our next pick-up.
- *You had concerns about the currency and completeness of certain sections of our contingency plan. You also recommended that we retain cover letters when submitting the plan to local authorities.* Our facility contingency plan is due to be reviewed, updated and receive engineering sign-off by November of this year. We are contracting with an outside consultant to perform this task. I will ensure that the consultant pay special attention to the areas that you discussed. When the revisions are complete, I will be sure to retain copies of the cover letters for the submissions to local authorities.





We appreciate your recommendations and the opportunity to advise you of the changes that we have made based on your findings. Should you require any additional information or have any questions, please feel free to contact me at 215-442-6224.

Regards,  
CRC Industries, Inc.

*Michelle Rudnick*

Michelle Rudnick  
Environmental, Health & Safety Manager

Attachments:

5-29-08 Training Sign-In Sheets (3 pages)  
Weekly Hazardous Waste Inspection Form (1 page)  
Land Disposal Restriction Form (2 pages)



# CRC INDUSTRIES INC. SIGN-IN SHEET

COURSE TITLE: Hazardous Waste / Stormwater / Environmental Regulations

INSTRUCTOR(S): Michelle Rudnick

DATE: May 29, 2008

PRINT NAME	SIGNATURE	DEPARTMENT
David Williams	David Williams	Technology
ANDY DROBEK	Andy Drobek	Technology
David Kerins	David W. Kerin	Production
WES BOWER	Wes Bower	PRODUCTION
MIKE HANNAN	Michael Hannan	mixing
DONALD F. BIZON	Donald F. Bizon	MAINT.
MIKE NABY	Mike Naby	MAINT.
FRED SIGNORINI	Fred Signorini	Technology
Photo Long	Photo Long	Production
FRANK CASSANO	Frank Cassano	Production
NICK D. LUALHATI	Nick D. Lualhati	Production
Eric Hammett	E. Hammett	Production
Brian Meinhardt	Brian Meinhardt	" "
Adam M. Seussel	Adam Seussel	Technology
Bill Sepple	William Seppel	Production
HENRY D. LUALHATI	Henry D. Lualhati	PRODUCTION
Nicholas Karone	Nicholas Karone	Production
Uy. SAVONG	Uy. Savong	Production
SUZANNE ZEFFER	Suzanne Zeffin	R+D
Susanne Donovan	Susanne Donovan	Technology
Darren Powell	Darren Powell	Production





# CRC INDUSTRIES INC.

## SIGN-IN SHEET

COURSE TITLE: Hazardous Waste / Stormwater / Environmental Regulations

INSTRUCTOR(S): Michelle Rudnick

DATE: May 30, 2008

[illegible]





COURSE TITLE: Hazardous Waste / Stormwater / Environmental Regulations

INSTRUCTOR(S): Michelle Rudnick

DATE: May 30, 2008

[illegible]



# Waste Storage Inspection Report

August-08

Week 1      Week 2      Week 3      Week 4      Week 5  
 Date:      
 

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## **Hazardous Waste Storage Areas:**

<b>1) Mixing Rooms</b>					
Number of waste drums - Room 1					
Room 2					
Are drums labeled properly?					
Are drums painted?					
Are drums closed?					
Are drums grounded?					
<b>2) Fill line 1</b>					
Are drums labeled properly?					
Are drums dated?					
Are drums painted?					
Are drums closed?					
Are drums grounded?					
Are drums on containment?					
<b>3) Fill line 2</b>					
Are drums labeled properly?					
Are drums dated?					
Are drums painted?					
Are drums closed?					
Are drums grounded?					
Are drums on containment?					
<b>4) Repack</b>					
Number of waste drums					
Drum labeled properly?					
Drum closed?					
Drum grounded?					
<b>5) Storage Rack</b>					
Number of drums in rack					
Are drums labeled properly?					
Are drums dated?					
Are drums painted?					
Are drums closed?					
Are drums in good condition?					

## **Non-hazardous & Universal Waste Storage Areas**

Number of wastewater totes					
Are all totes labeled?					
Are all totes in good condition?					
Any leaks observed?					
Number of universal waste containers					
Are universal waste lamps labeled?					
<b>Inspector's Initials:</b>					

**Comments:**





PHONE NO. : 610 491 3617

Apr. 10 2007 03:04AM P2

444 : John Morsberger

481.13: 4041 9:23AM

Hydroge. Inc

APR-09-2007 (MON) 14:51

ECUFLU

(FHX)336 855 4151 NO 0100 P. 302/003

LAND DISPOSAL RESTRICTION AND SUBPART CC WASTE  
DETERMINATION CERTIFICATION



Generator Name: Che Industries

Manifest Doc No: 002226232 JJK

Generator USEPA ID No. PED 06980025

State Manifest No. 1 \_\_\_\_\_

### INSTRUCTIONS:

In Column 1, identify all USEPA hazardous waste codes that apply to this waste approval/shipment. In Column 2, indicate the appropriate Toxicity Group, nonwater-soluble (NWS) or water-soluble (WS) for each waste code. In Column 3, in accordance with Subpart CC, identify whether or not your waste contains >500 ppmw VOC (YES or NO). In Column 4, enter the appropriate Subcategory Key # from Table - 4, if applicable, and also enter "Debris" in Column 4 if the waste is debris that will be treated using one of the alternative treatment technologies provided by 268.46. In Column 5, reference the appropriate Waste Management paragraph(s) from Table - 3. In Column 6, enter the Reference Number(s) from Table - 2 for all regulated constituents associated with Subpart CC VOCs, F001-F005, F039, D001-D043. If the waste is a California List waste, complete the boxes below and identify the Reference Number(s) of the appropriate California List constituent(s) identified in Table 2.

☐ Check this box if using a continuation sheet[illegible]

I hereby certify that all information submitted in this and all associated documents is complete and accurate to the best of my knowledge and information.

Signature \_\_\_\_\_

*J. Mosberg*

Two

Date \_\_\_\_\_

4-10-07



FROM : John Morsberger

PHONE NO. : 610 491 9617

Apr. 10 2007 03:04AM P3  
NO 0100 P 003/003

APR-09-2007 (MON) 14:51

ECOFLO

(FAX) 336 855 4137



# LAB PACK CERTIFICATION

Generator Name: CRC Industries Manifest Doc No.: 002226232-JSK

EPA ID Number: PAD 069200029 State Manifest Doc No.:

If your waste is packaged in lab packs and does NOT include waste codes listed on Appendix IV (see below), the following certification must be completed and the respective container numbers listed. Use additional sheets if necessary. If any lab pack containers INCLUDE waste codes listed in Appendix IV, the LDR Notification and Certification Form must be completed for those containers and the corresponding waste codes.

☐ Check this box if using a continuation sheet.

Container number(s):

916487							
916488							
916489							
916490							
916491							
916492							

## APPENDIX IV

D009	K004	K062	K106	P012	U134
F019	K005	K071	P010	P076	U151
K003	K006	K100	P011	P078	

268.7(a)(9)(i) - I certify under penalty of law that I personally have examined and am familiar with the waste and that the lab pack contains only wastes that have not been excluded under Appendix IV to Part 268 and that this lab pack will be sent to a combustion facility in compliance with the alternative treatment standards for lab packs at 40 CFR 268.42(c). I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment.

Signature: [Signature]

Print Name: J. Morsberger

Date: 4-10-07







UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

**FEDEX**

AUG 08 2008

Mr. Adam Selisker, V.P.  
Technology Division  
CRC Industries, Inc.  
885 Louis Drive  
Warminster, PA 18974

**Re: Notice of Violation  
Compliance Evaluation Inspection  
April 2, 2008  
CRC Industries, Inc.  
EPA ID No. : PAD069880029**

**Docket No.: R3-08-NOV-RCRA-26**

Dear Mr. Selisker:

On April 2, 2008, the U.S. Environmental Protection Agency, Region III ("EPA") conducted a Compliance Evaluation Inspection (copy enclosed) under the Pennsylvania Solid Waste Management Act ("SWMA"), as amended, 35 P.S. §§6018.101 - 6018.1003, and the Resource Conservation and Recovery Act ("RCRA"), as amended, 42 U.S.C. Sections 6901 et seq.. Based on the inspection and/or review of other pertinent information, EPA has determined that CRC Industries, Inc. ("CRC") was in violation of regulations promulgated under the SWMA and RCRA. As a result of this finding, the Agency is issuing this **Notice of Violation (NOV)**. The specific violations are:

1. In the Primary Hazardous Waste Storage Area, one 55gal drum of hazardous waste was found without a date. To qualify for less-than-90-day storage of hazardous waste without a permit, CRC must ensure that the date of accumulation is marked on each container of hazardous waste [in accordance with and Pa. Code 262a.10 and 40 CFR 262.34(a)(3)].
2. At the time of the inspection, one 55gal drum of hazardous waste was found next to tank T17 in Mixing Room 2 & 3 with an open bung and open funnel. To qualify as a satellite storage area which does not require a permit for storage, CRC must ensure that the container is kept closed except when necessary to add or remove waste [Pa. Code 262a.10 and 265a.1 (40 CFR 262.34(c)(1)(i) and 265.173(a))].
3. Just outside the Maintenance Shop six containers of used fluorescent lamps were found. Four of these containers were open and all were unlabeled. To allow for storage and management as Universal Waste, all used bulbs must be placed into closed containers [40 CFR 273.13(d)(1)] marked with one of the following phrases: "Universal Waste-Lamp(s)," "Waste Lamp(s)," or "Used Lamp(s)" [40 CFR 273.14(e)]. It should be noted that by the end of the inspection, all of these containers had been properly closed and labeled.
4. At the time of the inspection, one manifest was found without an associated Land Disposal Restriction ("LDR") form and it appeared to contain waste with codes not previously covered by other LDRs. Pa. Code 268a.1 and 40 CFR 268.7(a)(2) require generators to submit a one-time notification for each waste stream which does not meet the treatment standard. This notification must include all applicable EPA Hazardous

Waste Numbers. Copies of these notices must be maintained onsite for at least three years, according to Pa. Code 268a.1 and 40 CFR 268.7(a)(8).

#### Areas of Concern

- In the Primary Hazardous Waste Storage Area, the facility stores drums in a series of metal shelves. At the time of the inspection, most of the drums' labels could not be read and the condition of each drum could not be assessed. It is recommended the facility revise this method of storage to allow for adequate inspection of each drum's condition and labeling.
- In Mixing Room 2 & 3 an open, blue plastic container was found with what appeared to be used spill materials inside. The spill materials had an oily smell. Throughout the facility several of these type of containers were found. Although the facility representative stated that operators are trained not to place hazardous waste in such trash containers, it is recommended that these containers be labeled to ensure employees do not mistakenly place hazardous waste inside.
- During the inspection the facility representative stated that there has been no sample analyses of any waste streams, to date, and that the facility uses generator knowledge to determine whether or not a waste is hazardous (excepting the recent generation of site contamination investigation waste). Due to the complex and varied types of wastes generated it is recommended that the facility periodically run analytical testing on the various waste streams to ensure that wastes are properly categorized.
- The facility's contingency plan ("Emergency Response Plan") contained a list of emergency equipment, although it was very minimal and did not appear to reflect current conditions at the plant. It is recommended this information be expanded and updated. Also, CRC should try to retain evidence (such as cover letters) that the plan has been shared with local authorities.

Within thirty (30) calendar days of the receipt of this NOV, please submit documentation of any measures CRC has taken or is taking to achieve compliance with the violations noted above or provide an explanation of facts and circumstances that cause you to believe that EPA's determination of the alleged violations is in error. If the compliance measures identified are planned or are on-going, please provide a schedule for when the compliance measures will be completed.

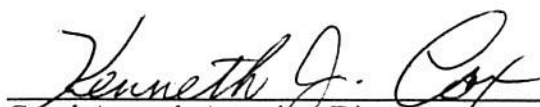
With regard to the Small Business Regulatory Enforcement and Fairness Act (SBREFA), please see the "Information for Small Businesses" memo, enclosed, which might be applicable to your company. This enclosure provides information on contacting the SBREFA Ombudsman to comment on federal enforcement and compliance activities and also provides information on compliance assistance. As noted in the enclosure, any decision to participate in such program or to seek compliance assistance does not relieve you of your obligation to respond in a timely manner to an EPA request or other enforcement action, create any rights or defenses under law, and will not affect EPA's decision to pursue this enforcement action. To preserve your legal rights, you must comply with all rules governing the administrative enforcement process. The Ombudsman and fairness boards do not participate in the resolution of EPA's enforcement action. EPA has not made a determination as to whether or not your facility is covered by the SBREFA.

Section 3008(a) of RCRA authorizes EPA to take an enforcement action whenever it is determined that any person has violated, or is in violation, of any requirement of RCRA as



amended. Such an action could include a penalty of up to \$27,500 per day of violation. In addition, failure to achieve and maintain compliance with the regulations cited in this NOV may be treated as a repeated offense and may constitute a "knowing" violation of Federal law. This NOV is not intended to address all past violations, nor does it preclude EPA from including any ongoing violations, including the ones cited in this letter, or past violations in any future enforcement action. The response to this NOV shall be addressed to:

Martin Matlin (3LC70)  
U.S. Environmental Protection Agency - Region III  
Office of Land Enforcement  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

  
\_\_\_\_\_  
Carol Amend, Associate Director  
for Office of Land Enforcement  
Land and Chemicals Division

8/8/08  
Date

Enclosures

cc: Bill Rarick, PADEP  
Martin Matlin, 3LC70  
Terri DiFiore, 3LC70







US Airbill

FedEx Tracking Number

8663 6139 5931

1 From Please print and print hard

Date 8/8/08 Sender's FedEx Account Number 1509-0196-0

Sender's Name MARTIN MATLIN Phone (215) 814-5789

Company EPA

Address 1650 ARCH ST 3670

City PHILADELPHIA State PA ZIP 19103-2029

2 Your Internal Billing Reference First 24 characters will appear on invoice

3 To Recipient's Name ADAM SELISKER Phone (215) 442-6223

Company CRC INDUSTRIES, INC.

Recipient's Address 885 LOUIS DRIVE

We cannot deliver to P.O. boxes or P.O. ZIP codes.

Address Dept./Floor/Suite/Room

City WARMINSTER State PA ZIP 18974

0383604651



Schedule a pickup at [fedex.com](http://fedex.com)

Simplify your shipping. Manage your account. Access all the tools you need.

SPH

0215

Sender's Copy

4a Express Package Service

☐ FedEx Priority Overnight  
Next business morning, \*\* Friday  
Shipments will be delivered on Monday unless SATURDAY Delivery is selected.  
☐ FedEx 2Day  
Second business day, \*\* Thursday  
Shipments will be delivered on Monday unless SATURDAY Delivery is selected.  
☐ FedEx Express Saver  
Third business day, \*\*  
Shipments will be delivered on Monday unless SATURDAY Delivery is selected.

4b Express Freight Service

☐ FedEx 1Day Freight  
Next business day, \*\* Friday  
Shipments will be delivered on Monday unless SATURDAY Delivery is selected.  
☐ FedEx 2Day Freight  
Second business day, \*\* Thursday  
Shipments will be delivered on Monday unless SATURDAY Delivery is selected.  
☐ FedEx 3Day Freight  
Third business day, \*\*  
Shipments will be delivered on Monday unless SATURDAY Delivery is selected.

5 Packaging

☒ FedEx Envelope  
☐ FedEx Pak  
Includes FedEx Small Pak, FedEx Large Pak, and FedEx Surety Pak.  
☐ FedEx Box  
☐ FedEx Tube  
☐ Other

6 Special Handling

☐ SATURDAY Delivery  
NOT Available for  
FedEx Standard Overnight, FedEx First Overnight, FedEx 2Day Freight, or FedEx 3Day Freight.  
☐ HOLD Weekday  
at FedEx Location  
NOT Available for  
FedEx First Overnight, FedEx 2Day Freight, or FedEx 3Day Freight.  
☐ HOLD Saturday  
at FedEx Location  
Available ONLY for  
FedEx Priority Overnight and FedEx 2Day to select locations.

7 Payment Bill to:

☐ No  
☐ Yes  
Dangerous goods (including dry ice) cannot be shipped in FedEx packaging.  
☐ Recipient  
☐ Third Party  
☐ Credit Card  
☐ Cash/Check

8 Residential Delivery Signature Options

☐ No Signature Required  
Package may be left without obtaining a signature for delivery.  
☐ Direct Signature  
Someone at recipient's address may sign for delivery. For signature required for delivery.  
☐ Indirect Signature  
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. For signature required for delivery.

Total Packages Total Weight Total Declared Value\*

FedEx Acct. No. Credit Card No.

9

Rev. Date 10/06-Part #158279-C1994-2006 FedEx-PRINTED IN U.S.A.-CSRS





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1350 Arch Street  
Philadelphia, Pennsylvania 19103-2029

JUL 14 2008

Mr. Rick Shipman  
Chief, Hazardous Waste Compliance/Enforcement  
PA Department of Environmental Protection  
Rachel Carson State Office Building  
400 Market St., 14<sup>th</sup> Floor  
Harrisburg, PA 17105

**RE: RCRA Proposed Notice of Violation  
CRC Industries (PAD069880029)**

Dear Mr. Shipman:

The U.S. Environmental Protection Agency Region III is pursuing the issuance of a Notice of Violation to CRC Industries in Warminster, PA (PAD069880029) pursuant to the Resource Conservation and Recovery Act (RCRA) as amended by the Hazardous and Solid Waste Amendments (HSWA) of 1984. These actions will address violations of RCRA Subtitle C.

I appreciate your cooperation in this matter and look forward to your continued efforts toward a successful enforcement program. Should you have any questions regarding this matter, please contact me at (215) 814-5430 or Martin Matlin at (215) 814-5789.

Sincerely,

A handwritten signature in cursive script, appearing to read "Carol Amend".

Carol Amend, Chief  
RCRA Compliance and Enforcement Branch

cc: M. Matlin, 3WC31 ✓





Tiered 6/5/08

**ENFORCEMENT PRIORITY SCREENING CHECKLIST**  
**ENFORCEMENT SENSITIVE - DO NOT RELEASE**

<b>Name and Location of Violator:</b>	<b>Program Contact:</b> <u>Martin Matlin</u>
<u>CRC Industries, Inc.</u> <u>885 Louis Drive</u> <u>Warminster, PA 18974</u>	<b>ORC Contact:</b> _____ <b>RCRA ID#:</b> <u>PAD069880029</u> <b>RCRA Status:</b> <u>LOG</u>
<b>Industry SIC Code:</b> <u>2899</u> <b># of Employees:</b> <u>160</u>	
<b>Date of Inspection:</b> <u>4/2/08</u> <b>Annual Income:</b> _____	
<b>Recommended Action:</b> <u>NOV</u> <b>EJ Area:</b> _____	
<b>Projected Quarter:</b> _____ <b>Children's Health Issue:</b> _____	
<b>SCREENING QUESTIONS</b>	
<p><b>1. What is the violation(s)? Were there violations of reporting requirements such as manifest, DMRs, lab reports or training? Did the violation(s) deprive EPA or any state or local environmental agency of information critical to its program operation or otherwise undermine the regulatory scheme? Please Describe:</b></p> <ul style="list-style-type: none"><li>- Failure to date one 55gal drum of HW</li><li>- Failure to keep closed one 55gal drum of HW in satellite area</li><li>- Failure to keep closed and properly labeled four UW lamp containers</li><li>- One manifest missing associated LDR form</li></ul>	
<p><b>2. Could or did the violation cause or contribute to actual harm to public health or the environment? Is the violation continuing?</b></p> <p>NO</p>	
<p><b>3. Is this a repeat or recurring violation or violator? Is there a history of non-compliance? Please Describe:</b></p> <p>NO</p>	
<p><b>4. Is this a significant/high priority violation according to the program's guidance?</b></p> <p>NO</p>	

<p><b>5. Are there known or suspected violations of other regulatory requirements? Does this case have multi-media potential?</b></p> <p><b>NO</b></p>
<p><b>6. Have there been any State enforcement actions taken for the violation(s)?</b></p> <p><b>NO</b></p>
<p><b>7. Has the company or any individuals employed by the company submitted false or misleading information or documents? Has there been any tampering with monitoring equipment?</b></p> <p><b>NO</b></p>
<p><b>8. Does the violation involve knowing, willful or negligent conduct by the company or any individual employed by the company? Is there evidence that the violator was, or should have been, aware of the requirement(s) which were violated? Please describe:</b></p> <p><b>NO</b></p>
<p><b>9. Is it known whether the violator has received compliance assistance and has failed to correct the violation in a timely manner? Please describe:</b></p> <p><b>NO</b></p>
<p><b>10. Is it suspected that the violator may have obtained an economic benefit or an unfair competitive advantage in its industry from its noncompliance?</b></p> <p><b>NO</b></p>
<p><b>11. Should an enforcement action proceed to the penalty stage, are there any known SEP proposals that might be brought to the violator's attention?</b></p> <p><b>NO</b></p>
<p><b>12. Did the violation occur in a Community Based, Sector Based or Regional Strategic Planning Priority Area as reflected in the current Enforcement MOA or elsewhere?</b></p> <p><b>Unknown</b></p>

**Enforcement Options:**

**NOV**

September 14, 1994

If you have any questions concerning this matter, please feel free to contact this office at the above number.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Dennis Harney", with a stylized flourish at the end.

Dennis Harney  
Waste Management Program

ENCLOSURE: Inspection Report 7/25/1994

cc: Regional  
Compliance  
File  
EPA

FILE SECTION

SEP 21 7 1994

EPA REGION III





COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL RESOURCES

1875 New Hope Street  
Norristown, PA 19401  
215 270-1948

December 19, 1990

Mr. Charles Graber  
CRC Chemicals  
885 Louis Drive  
Warminster, PA 18974

TSD

Re: Settlement Letter  
Hazardous Waste Inspection  
PAD069880029  
Warrington Township  
Bucks County

Dear Mr. Graber:

Inspections of the above referenced facility conducted on May 15, 1989, May 4, 1988, and February 26, 1986 revealed violations of applicable sections of the Solid Waste Management Act and rules and regulations promulgated pursuant to it.

Specifically, the inspection of May 15, 1989 revealed manifests that were not filled out properly and incomplete, contrary to 25 PA Code §262.20.

In addition, the inspection of May 4, 1988 revealed that hazardous waste had been held in storage for a time period exceeding 90 days. Such storage of hazardous waste without a permit is contrary to 25 PA Code §262.34 (2).

The inspection of February 26, 1986 revealed that hazardous waste had been held in storage for a time period exceeding 90 days, contrary to 25 PA Code §262.34. Also, on February 26, 1986, containment at the storage tank was not provided, contrary to 25 PA Code §264.175. Quarterly reports had not been filed with the Department, contrary to 25 PA Code §262.41, and containers were not managed to prevent spills and leaks, contrary to 25 PA Code §264.173.

The violations described above constitute unlawful conduct pursuant to Sections 401 (a), 403(b)(9), 501(a), 610(2) and (9) of the Pennsylvania Solid Waste Management Act of July 1980 (Act 97), 35 P.S. 6018.101 et seq.

The Department is responsible for enforcement of the Pennsylvania Solid Waste Management Act, including the recovery of monetary civil penalties for violations of Commonwealth Law.

To avoid litigation, we are willing to resolve this matter by accepting a monetary civil penalty payment for the specific violations described above. We are proposing a settlement on the following basis:







COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL RESOURCES

Suite 6010 Lee Park  
555 North Lane  
Conshohocken, PA 19428  
September 14, 1994

(610) 832-6212  
Fax: (610) 832-6259

Southeast Regional Office

Adam Selisker  
Environmental and Safety Coordinator  
CRC Chemical Inc.  
885 Louis Drive  
Warminster, PA 18974

Re: Hazardous Waste Inspection  
7/25/1994  
CRC Chemical Inc.  
PAD06988029  
Warminster  
Bucks County

NOTICE OF VIOLATION

Dear Mr. Selisker:

As a result of the Department's July 25, 1994 inspection at CRC Chemical Inc. ("CRC"), 885 Louis Drive, Warminster, Bucks County, the Department believes that CRC is in violation of the Solid Waste Management Act of the Commonwealth of Pennsylvania, Act of July 7, 1980 P.L. 380, as amended, 35 P.S. § 6018.101 et seq. ("SWMA"); and the Rules and Regulations promulgated thereunder, as follows:

1. In several areas around the facility, hazardous waste containers were not labeled to accurately identify contents. This is contrary to 25 PA Code § 265.173(c).
2. These accumulation areas where containers are located are not inspected weekly. This is contrary to 25 PA Code § 265.174.
3. These accumulation areas lack proper containment and collection systems. This is contrary to 25 PA Code § 265.178.
4. Several containers were lacking accumulation dates. This is contrary to 25 PA Code § 262.34(a)(2).
5. Containers not managed in accordance with Chapter 265, Subchapter I are in violation of 25 PA Code § 262.34(a)(3).



The Department believes that the activities and conditions described in paragraphs 1 through 5 above constitute a public nuisance pursuant to Section 601 of the SWMA, P.S. 35 § 6018.601 and constitute unlawful conduct pursuant to Sections 6018.610(1), 6018.610(2), 6018.610(4) and 6018.610(9) of the SWMA, 35 P. S. §§ 6018.610(1), 6018.610(2), 6018.610(4) and 6018.610(9).

In order to achieve compliance with the SWMA, the following recommendations are made.

1. It is recommended that CRC labels all hazardous waste containers in a manner that accurately identifies contents.
2. It is recommended that CRC inspects hazardous waste accumulation areas weekly, documenting such inspections in an inspection log book.
3. It is recommended that CRC provides proper containment and collection systems for all hazardous waste accumulation areas.
4. It is recommended that CRC labels all hazardous waste containers with accumulation dates that are visible for inspection.
5. It is recommended that CRC manages hazardous waste containers in accordance with Chapter 265, Subchapter I as required by Chapter 262.

The Department suggests that CRC submit to the Department within fifteen (15) days of receipt of this Notice of Violation a written report addressing the circumstances under which these violations occurred, a proposed program and schedule for the abatement of these violations and a proposal to prevent their recurrence.

This letter does not impose any obligation upon CRC and shall not be construed as an appealable action or adjudication of the Department of Environmental Resources.

This Notice of Violation does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this letter or the conditions upon which the letter is based. This letter shall not be construed so as to waive or impair any rights of the Department of Environmental Resources, heretofore or hereafter existing.

RECEIVED  
PA/DC SECTION  
SEP 27 1994  
EPA REGION III



Mr. Charles Graber  
December 19, 1990

- 2 -

1. By January 16, 1991, CRC Chemicals will pay five thousand dollars (\$5000.00) to the Pennsylvania Solid Waste Abatement Fund by means of a check made payable to the "Commonwealth of Pennsylvania Solid Waste Abatement Fund".
2. Upon receipt of the above payment and this signed agreement, the Department agrees to forego any further monetary civil penalty enforcement action against CRC Chemicals for the specific violations and dates mentioned above.
3. Notwithstanding the above, nothing in this agreement shall be construed to relieve CRC Chemicals of any liability for unknown effects of violations described herein which may arise or be discovered in the future.

If our settlement proposal is acceptable, please have all copies of this agreement signed and dated on or before January 16, 1991. Two corporate officers must sign (President or Vice President, and Secretary or Treasurer), and the corporate seal must be affixed to each copy. Please return all copies of this agreement and the required penalty payment to our office at the above letterhead address. We will then execute the agreement on behalf of the Department and return an executed copy for your and your records.

10



Mr. Charles Graber

December 19, 1990

- 3 -

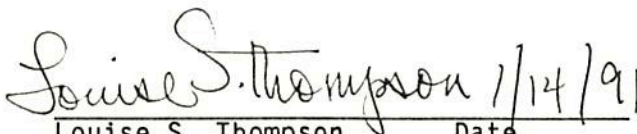
Please be notified that after January 16, 1991, this settlement proposal will become void, and we will pursue other enforcement alternatives. If you have any questions, please contact me.

Very truly yours,



BRUCE D. BEITLER  
Operations Manager

FOR THE DEPARTMENT:

 1/14/91

Louise S. Thompson Date

Assistant Counsel

Approved as to Form and Legality

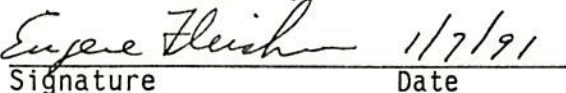
 1/30/91

Joseph A. Feola Date

Environmental Protection Manager

Bureau of Waste Management

FOR CRC CHEMICALS, INC.:

 1/7/91

Signature

Date

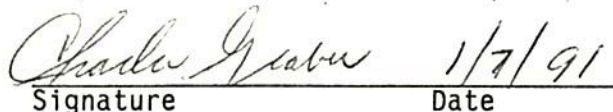
Eugene Fleishman

Name

President

Title

Corporate Seal

 1/7/91

Signature

Date

Charles Graber

Name

Vice President, Manufacturing

Title

cc: Harrisburg Compliance  
Regional Director  
Office of Chief Counsel  
Mr. Feola  
Compliance Monitoring  
Re 30 (COA)856

APR 09 1991



Department of Environmental Resources

TSD

1875 New Hope Street  
Norristown, PA 19401  
215 270-1943

June 9, 1989

Mr. Charles Graber  
CRC Chemicals  
885 Louis Drive  
Warminster, PA 18974

Re: Hazardous Waste Inspection  
May 15, 1989 PAD069880029  
Warminster Township  
Bucks County

NOTICE OF VIOLATION

Dear Mr. Graber:

This letter is to confirm the findings of the Department's referenced inspection of your hazardous waste activities. Requirements for hazardous waste facilities are contained in Chapter 75.260 through 75.267 of the Rules and Regulations of the Department. Violations of applicable sections of these regulations found during our inspection are as follows:

75.262(e)(7) Manifests filled out properly and completely.

You are hereby notified of both the existence of these violations as well as the need to provide for their prompt correction. Toward this end, you are requested to submit to the Department within fourteen (14) days a proposed program and schedule for abatement of these violations. The Department's inspection report contains time periods of completion of remedial actions. These reports are either enclosed or have been previously supplied to you. If your proposed abatement program indicates certain corrections cannot be completed within these time periods, you are requested to supply justification for any extensions.

If you have any questions concerning this matter, please feel free to contact me at the above number.

Very truly yours,

FREDERICK P. WALTER, JR.  
Waste Management Specialist

cc: Ms. Kurtz  
Mr. Minihan  
EPA  
Re 30 (GJC)160.12



*Green*

Department of Environmental Resources

1875 New Hope Street  
Norristown, PA 19401  
215 270-1920

March 10, 1986

Allen Reed, Jr., Vice President  
CRC Chemicals USA  
855 Louis Drive  
Warminster, PA 18974

Re: Hazardous Waste Inspection  
PAD 069880029  
February 26, 1986

NOTICE OF VIOLATION

Dear Mr. Reed:

This letter is to confirm the findings of the Department's referenced inspection of your hazardous waste activities. Requirements for hazardous waste facilities are contained in Chapters 75.260 through 75.267 of the Rules and Regulations of the Department. Violations of applicable sections of these regulations found during our inspection are as follows:

Generator

75.262(g)(1) Wastes have been accumulated on-site in excess of 90 days, based on available manifests from July and December, 1985.

75.262(g)(1) Containers outside of containment wall at storage tank are not managed in accordance with 75.265(a) in that containment is not being provided.

75.262(i) Quarterly report has not been filed with the Department for the 4th Quarter of 1985 since a September, 1985 decision was made to eliminate TSD status.

The PPC Plan previously submitted to the Department should be reviewed and updated to include Blending Room containment and any other relevant changes that may have occurred since 1981.

TSD

75.265(k)(2)(vii) Written operating record does not contain closure cost estimates.

has been reported since 1981, wanted to include 1981-1982. The FBI then reportedly submitted to the Bureau a copy of the report, which was changed to include 1981-1982.

986121 dm

CONTAINS HAZARDOUS



Allen Reed, Jr., Vice President

March 10, 1986

- 2 -

75.265(o)(2)-(9) Closure plan not up-to-date.

75.265(p)(2)-(4) Annual closure cost estimate not up-to-date.

75.265(q)(1),(4) Containers not managed to prevent leaks and spills.

As we discussed you should prepare your closure plan for the storage tank separate from the response to this Notice.

You are hereby notified of both the existence of these violations as well as the need to provide for their prompt correction. Toward this end, you are requested to submit to the Department within fourteen (14) days a proposed program and schedule for abatement of these violations.

This letter does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this letter or the conditions upon which the letter is based. This letter shall not be construed so as to waive or impair any rights of the Department of Environmental Resources, heretofore or hereafter existing.

This letter shall also not be construed as a final action of the Department of Environmental Resources.

If you have any questions concerning this matter, please feel free to contact me at 270-1920.

Very truly yours,



MICHAEL M. POBERK  
Waste Management Specialist

cc: G. Danyliw  
G. Bonner  
Michael Pennella  
Division of Hazardous Waste (2)  
Re 30 3W65.9

Allen Bell, Jr., Vice President  
March 10, 1972  
- 2 -

72-287(1)(2)-(3) (b) (c) (d) (e) (f) (g) (h) (i) (j) (k) (l) (m) (n) (o) (p) (q) (r) (s) (t) (u) (v) (w) (x) (y) (z) (aa) (ab) (ac) (ad) (ae) (af) (ag) (ah) (ai) (aj) (ak) (al) (am) (an) (ao) (ap) (aq) (ar) (as) (at) (au) (av) (aw) (ax) (ay) (az) (ba) (bb) (bc) (bd) (be) (bf) (bg) (bh) (bi) (bj) (bk) (bl) (bm) (bn) (bo) (bp) (bq) (br) (bs) (bt) (bu) (bv) (bw) (bx) (by) (bz) (ca) (cb) (cc) (cd) (ce) (cf) (cg) (ch) (ci) (cj) (ck) (cl) (cm) (cn) (co) (cp) (cq) (cr) (cs) (ct) (cu) (cv) (cw) (cx) (cy) (cz) (da) (db) (dc) (dd) (de) (df) (dg) (dh) (di) (dj) (dk) (dl) (dm) (dn) (do) (dp) (dq) (dr) (ds) (dt) (du) (dv) (dw) (dx) (dy) (dz) (ea) (eb) (ec) (ed) (ee) (ef) (eg) (eh) (ei) (ej) (ek) (el) (em) (en) (eo) (ep) (eq) (er) (es) (et) (eu) (ev) (ew) (ex) (ey) (ez) (fa) (fb) (fc) (fd) (fe) (ff) (fg) (fh) (fi) (fj) (fk) (fl) (fm) (fn) (fo) (fp) (fq) (fr) (fs) (ft) (fu) (fv) (fw) (fx) (fy) (fz) (ga) (gb) (gc) (gd) (ge) (gf) (gg) (gh) (gi) (gj) (gk) (gl) (gm) (gn) (go) (gp) (gq) (gr) (gs) (gt) (gu) (gv) (gw) (gx) (gy) (gz) (ha) (hb) (hc) (hd) (he) (hf) (hg) (hh) (hi) (hj) (hk) (hl) (hm) (hn) (ho) (hp) (hq) (hr) (hs) (ht) (hu) (hv) (hw) (hx) (hy) (hz) (ia) (ib) (ic) (id) (ie) (if) (ig) (ih) (ii) (ij) (ik) (il) (im) (in) (io) (ip) (iq) (ir) (is) (it) (iu) (iv) (iw) (ix) (iy) (iz) (ja) (jb) (jc) (jd) (je) (jf) (jg) (jh) (ji) (jj) (jk) (jl) (jm) (jn) (jo) (jp) (jq) (jr) (js) (jt) (ju) (jv) (jw) (jx) (jy) (jz) (ka) (kb) (kc) (kd) (ke) (kf) (kg) (kh) (ki) (kj) (kk) (kl) (km) (kn) (ko) (kp) (kq) (kr) (ks) (kt) (ku) (kv) (kw) (kx) (ky) (kz) (la) (lb) (lc) (ld) (le) (lf) (lg) (lh) (li) (lj) (lk) (ll) (lm) (ln) (lo) (lp) (lq) (lr) (ls) (lt) (lu) (lv) (lw) (lx) (ly) (lz) (ma) (mb) (mc) (md) (me) (mf) (mg) (mh) (mi) (mj) (mk) (ml) (mm) (mn) (mo) (mp) (mq) (mr) (ms) (mt) (mu) (mv) (mw) (mx) (my) (mz) (na) (nb) (nc) (nd) (ne) (nf) (ng) (nh) (ni) (nj) (nk) (nl) (nm) (nn) (no) (np) (nq) (nr) (ns) (nt) (nu) (nv) (nw) (nx) (ny) (nz) (oa) (ob) (oc) (od) (oe) (of) (og) (oh) (oi) (oj) (ok) (ol) (om) (on) (oo) (op) (oq) (or) (os) (ot) (ou) (ov) (ow) (ox) (oy) (oz) (pa) (pb) (pc) (pd) (pe) (pf) (pg) (ph) (pi) (pj) (pk) (pl) (pm) (pn) (po) (pp) (pq) (pr) (ps) (pt) (pu) (pv) (pw) (px) (py) (pz) (qa) (qb) (qc) (qd) (qe) (qf) (qg) (qh) (qi) (qj) (qk) (ql) (qm) (qn) (qo) (qp) (qq) (qr) (qs) (qt) (qu) (qv) (qw) (qx) (qy) (qz) (ra) (rb) (rc) (rd) (re) (rf) (rg) (rh) (ri) (rj) (rk) (rl) (rm) (rn) (ro) (rp) (rq) (rr) (rs) (rt) (ru) (rv) (rw) (rx) (ry) (rz) (sa) (sb) (sc) (sd) (se) (sf) (sg) (sh) (si) (sj) (sk) (sl) (sm) (sn) (so) (sp) (sq) (sr) (ss) (st) (su) (sv) (sw) (sx) (sy) (sz) (ta) (tb) (tc) (td) (te) (tf) (tg) (th) (ti) (tj) (tk) (tl) (tm) (tn) (to) (tp) (tq) (tr) (ts) (tt) (tu) (tv) (tw) (tx) (ty) (tz) (ua) (ub) (uc) (ud) (ue) (uf) (ug) (uh) (ui) (uj) (uk) (ul) (um) (un) (uo) (up) (uq) (ur) (us) (ut) (uu) (uv) (uw) (ux) (uy) (uz) (va) (vb) (vc) (vd) (ve) (vf) (vg) (vh) (vi) (vj) (vk) (vl) (vm) (vn) (vo) (vp) (vq) (vr) (vs) (vt) (vu) (vv) (vw) (vx) (vy) (vz) (wa) (wb) (wc) (wd) (we) (wf) (wg) (wh) (wi) (wj) (wk) (wl) (wm) (wn) (wo) (wp) (wq) (wr) (ws) (wt) (wu) (wv) (ww) (wx) (wy) (wz) (xa) (xb) (xc) (xd) (xe) (xf) (xg) (xh) (xi) (xj) (xk) (xl) (xm) (xn) (xo) (xp) (xq) (xr) (xs) (xt) (xu) (xv) (xw) (xx) (xy) (xz) (ya) (yb) (yc) (yd) (ye) (yf) (yg) (yh) (yi) (yj) (yk) (yl) (ym) (yn) (yo) (yp) (yq) (yr) (ys) (yt) (yu) (yv) (yw) (yx) (yy) (yz) (za) (zb) (zc) (zd) (ze) (zf) (zg) (zh) (zi) (zj) (zk) (zl) (zm) (zn) (zo) (zp) (zq) (zr) (zs) (zt) (zu) (zv) (zw) (zx) (zy) (zz)

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As no discussion was held, please your response for the above item  
response for the response to this letter.

You are hereby notified of both the existence of these violations as well as the  
need to provide for their future prevention. Please this and, you are requested  
to submit to the Department within fourteen (14) days a proposed program and  
schedule for abatement of these violations.

This letter does not constitute, either expressly or by implication, the giving of  
advice or the recommendation of any course of action to be taken by you and all  
violations of law within your jurisdiction. This letter shall not be construed  
as an admission of fault or liability on the part of the Department of Environmental  
Resources, hereinafter referred to as the Department.

This letter shall also not be construed as a final action of the Department of  
Environmental Resources.

If you have any questions concerning this letter, please feel free to contact me  
at 707-255-1000.

Very truly yours,

*Handwritten signature*

THOMAS A. BROWN  
State Management Specialist

cc: G. J. Brown  
J. Brown  
Michael Brown  
Division of Inspection (12)  
15-70-255-1000